RESPONSE DOCUMENT: STAFF ANALYSIS OF COMMENTS RECEIVED ON SUSTAINABLE HALTON PHASE 2 WORK, June 11, 2008 to March 20, 2009

APRIL 7, 2009

Phase 3 Sustainable Halton Report 3.01

INTRODUCTION

This document responds to written submissions received by Halton Region on the Sustainable Halton Phase 2 process between June 11, 2008 and March 20, 2009. The Region's public comment period on the Five Physical Structure Concepts (the Five Growth Concepts) occurred from June 11, 2008 to September 30, 2008. This document contains all submissions received during this period. From October 1, 2008 to March 20, 2009, any further submissions that were received on Sustainable Halton have also been included in this document. Please note that submissions received between June 11, 2008 and October 24, 2008 were previously released as Attachment #1 to staff report LPS36-08.

The index of submissions has been organized alphabetically for ease of reference and identifies the page number on which to find each submission. The index also includes a column identifying the geographic location for any site specific submissions.

The document is organized into three columns: Source, Submission (the full submission has been transcribed), and Response. The submissions are organized into the following categories, in this order: Local Municipal Staff Reports, Public Agency Comments, Private Organization Comments, and Public Comments. With the exception of the Local Municipal Staff Reports category, the submissions within each category are organized chronologically.

A number of the submissions included supporting technical reports or documents (identified at the end of the submission). To view these technical reports or documents, please contact Halton Region Planning Services at (905) 825-6000.

Please note that any submissions received after March 20, 2009 will be addressed through a subsequent response document addressing comments received through the next round of public consultation on Sustainable Halton.

Attachments to Report 3.01:

- Attachment #1: Minutes of the Meeting with Mattamy Development Corporation, Wednesday, November 20, 2008.
- Attachment #2*: Appendix 'C' to Town of Milton staff report PD-070-08 (Schedule 1 Future Employment Land Areas of interest to the Town of Milton).
 - Figure 1 to Mattamy Development Corporation submission dated September 24, 2008
 - Figure 2 to Mattamy Development Corporation submission dated September 24, 2008.
 - * These items were not included in the Submissions Package released as Attachment #1 to staff report LPS36-08 and therefore are being provided as an attachment to this document.
- Attachment #3: Submissions received after March 20, 2009 (these submissions will be addressed through a subsequent response document).

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SUBMISSIONS RECEIVED ON SUSTAINABLE HALTON BETWEEN JUNE 11, 2008 AND MARCH 20, 2009

Source	SUBMISSION	Response			
Local Municipa	Local Municipal Staff Reports				
City of Burlington Report No. PL-66/08	1.0 RECOMMENDATION:1. THAT Planning Department report PL-66/08, dated August 15, 2008, be received and filed; and				
September 29, 2008					
	2. THAT Burlington recommend to the Region of Halton that discussions with the Province are warranted on the need to provide additional employment lands within the Region beyond the 600 ha identified as needed to 2031; and	Recommendation #2: Through regular meetings of the Sustainable Halton Inter-Municipal Technical Committee (comprised of Regional staff, Local Municipal Planning Staff, Public Agencies, and the Province), discussions with the Province have taken place on the potential allocation of additional employment lands.			
		Hemson Consulting Ltd has completed an updated land supply analysis. Based on additional information (which included previously unavailable 2006 Census data), as well as further analysis of the type of employment development occurring in Halton, the employment land needs has been increased to a total of 1,100 hectares. The detailed land supply analysis can be found in the report <i>Sustainable Halton:</i> Accommodating Growth to 2031.			
	3. THAT Burlington identify its support for the proposed CN Rail inter-modal site in southwest Milton and the additional CN Rail land holdings in southwest Milton in the Region of Halton's consideration of employment land needs to 2031 and as a Special Study Area for long term rail-serviced employment use during the preparation of a preferred Growth Concept Plan; and	Recommendation #3: Included as part of the updated employment land needs of 1,100 hectares is approximately 200 hectares of employment land south of Milton along Tremaine Road, adjacent to the rail line.			
	4. THAT the estimated number of Burlington residential intensification units to 2031 as contained in Planning Department report PL-66/08, dated August 15, 2008, which has been forwarded to Halton Region for use in Sustainable Halton, be reconfirmed as 9700 units; and	Recommendation #4: The Region has adopted a "bottom-up" approach with respect to achieving the intensification targets established in			

Source	SUBMISSION	Response
Source	5. THAT a copy of PL-66/08, dated August 15, 2008 and Council Resolution be forwarded to Halton Region and the Towns of Oakville, Milton and Halton Hills. 2.0 PURPOSE: To present an update on the various growth concepts contained in the Sustainable Halton Plan exercise presented by the Region of Halton. 3.0 BACKGROUND AND RELATIONSHIP TO STRATEGIC PLAN: Background: In 2007 the Region began the Sustainable Halton Planning exercise in order to meet the obligations contained in the Minutes of Settlement for Regional Official Plan Amendment 25 (R.O.P.A. 25) and to achieve conformity with the Provincial Growth Plan. Phase I of this exercise involved the preparation of a series of background reports, covering topics such as land supply, demographic change, natural heritage system options, and agricultural countryside vision. This series of 19 background reports was prepared by various consultants and co-ordinated by the firm of Meridian Planning Consultants. These various background papers were used to help define the issues and goals to be considered in the preparation of the	Places to Grow. The Region has received Burlington's reconfirmed estimated number of residential intensification units to 2031 and has ensured that these numbers were incorporated into the intensification work.
	In 2008 Phase II of the Sustainable Halton Plan commenced with assistance from the consulting firm of Urban Strategies and associated firms. This phase involves the development of growth concepts as well as preparation of a framework to evaluate the various land use concepts. It should be pointed out that the primary study area is that portion of the Region outside of existing defined urban areas and outside of the Provincial Greenbelt. There are no lands within Burlington located within the Sustainable Halton Primary Study Area. Initially 9 urban structure concepts were prepared, which were evaluated based on input from the public and stakeholder groups. The result of this exercise is the 5 concepts summarized in Appendix No. 1 and illustrated in Appendix No. 2 of this report. The image quality of the five concepts shown in Appendix 2 is poor. For greater clarity, better quality versions of the five concepts will be circulated under separate cover and copies made available to the public at the Community Development	
	Committee meeting when this report is considered. It is the Region's intention to further reduce the number of concepts, based on the input received, in order to allow a	

Source	SUBMISSION	Response
	thorough and comprehensive evaluation prior to bringing forward a final preferred option. The target date for completion of the Sustainable Halton Plan is June 2009, in keeping with the deadline for conformity with the Provincial Growth Plan and the requirements of the R.O.P.A. No. 25 Minutes of Settlement. The Region has requested the submission of comments on the five Growth Concept Plans by September 30, 2008. The Evaluation Framework for the growth options is contained in Appendix No. 3. This framework is organized around the following four key themes:	
	Protect what is valuable Foster complete, healthy, sustainable communities throughout the Region Ensure stable infrastructure to support growth Promote health for all	
	4.0 PROVINCIAL GROWTH PLAN AND PLANNING DISCUSSION: 4.1 Provincial Growth Plan: The Provincial Growth Plan establishes a target for the Region of Halton of 780,000 population and 390,000 jobs by 2031. After 2015, at least 40 percent of the new residential units within the Region must occur within the "built up area", which is commonly referred to as "infill, intensification, redevelopment or "in-city development". The Growth Plan also requires that on a Regional scale, all development in "greenfield" areas (lands outside the built-up area) must achieve a gross density of at least 50 people and jobs per hectare.	
	4.2 Planning Discussion: 4.2.1 Employment Lands All of the five concepts discussed and illustrated in Appendix No. 1 and 2 of this report focus future population and employment growth on Halton Hills and/or Milton, given these are the areas having lands outside of the existing urban boundary and the Provincial Greenbelt Plan. As such, there are no direct land use impacts on Burlington.	
	The Sustainable Halton exercise has identified that the Provincial Growth Plan target for jobs, coupled with the prescribed "greenfield employment density results in an identified need for 600 hectares of additional employment land within Halton to 2031. Recent employment development trends in Halton identify the growth of logistics and distribution centres, which have a much lower employment density than that experienced in previous decades due to automation and a focus on goods storage rather than production/assembly. The most recent estimate of employment density in Halton employment areas is an average of 37 employees/hectare. As a result, the target of 50 jobs per hectare for "greenfield employment lands on a Halton wide basis is felt to present a	Recognizing that much of the new employment land development, particularly in Milton and Halton Hills along the Highway 401 corridor has a much lower employment density than elsewhere in the Region because of the preponderance of highly automated distribution and warehousing facilities, the employment land budget has increased to 1,100 hectares based on the updated employment land analysis. The details of this updated

Source	SUBMISSION	Response
	significant challenge. To achieve the prescribed Greenfield employment density a mix including major office developments and traditional manufacturing oriented uses would be needed. In addition, within some parts of Halton, the traditional supply and demand model may not function, since some landowners are prepared to hold properties for extended periods for various reasons. As a result it is anticipated that a greater reserve of additional Greenfield employment lands throughout the Region may be required to facilitate the Growth Plan employment target for Halton.	work are provided in report 3.07 Sustainable Halton: Accommodating Growth to 2031, prepared by Hemson Consulting Inc.
	Canadian National Railways have acquired approximately 350 hectares of land along their tracks in southwest Milton, near the Burlington Tremaine Road boundary, to accommodate an inter-modal facility as well as additional rail-serviced employment lands. The inter-modal facility itself would require only a small portion of this holding. While a CN inter-modal facility does not require local approvals as it is a federally regulated company, the adjacent development of land for non inter-modal related development would require local and Regional planning approvals.	Canadian National made a submission dated September 12, 2008 which stated that due to changes in CN's operations, these lands are no longer required for intermodal purposes. It goes on to state that CN now sees a significant opportunity in the development of a portion of these lands for railway supportive industrial and associated purposes. Please refer to their submission for more information. (page 77).
	The timing of the railway facility to accommodate inter-modal traffic would be determined by economic conditions and the CN business plan. Given that the inter-modal facility represents a potentially significant piece of transportation infrastructure for the GTA which could develop based on need for such facilities, it would be appropriate to identify the CN location on the Halton Growth Concepts. In a presentation to Halton Council in June 2008, CN identified that while there is no immediate timing for establishment of the inter-modal facility, they would like consideration of their approximately 350 hectare holding for employment use as part of Sustainable Halton.	The refined Growth Concepts identify the locations for the 1,100 hectares of proposed employment lands which includes approximately 200 hectares in south Milton along Tremaine Road adjacent to the rail line.
	Development of these lands on the east side of Tremaine Road, north of Highway 407, has not been provided for in the allocation of employment lands in any of the five Growth Concepts. Development of significant employment opportunities in this area would provide additional employment opportunities for Burlington residents, without the need for extensive commuting. As a result, staff believe that allocation of some long-term employment to the area around the potential CN inter-modal facility both to 2031 and in the long term would be reasonable. This is especially true if the Province recognizes that some additional employment lands to 2031 over the 600 hectare target would be reasonable towards achieving employment sustainability for the Region. The CN Rail lands would provide rail-serviced employment which the other employment land locations identified in the five Concepts could not provide.	Please refer to the response to Recommendation #3 (see above).

Source	SUBMISSION	Response
	As a result, it is the opinion of staff that the Region should discuss with the Province whether the Sustainable Halton identification of 600 hectares of new employment land should be reconsidered. Halton should also give consideration of the role which the CN Rail lands should play in the provision of employment growth to 2031 and beyond. To facilitate these further discussions and analysis, it would be appropriate to identify the CN Rail lands as a Special Study Area for long-term employment needs as well as consider this location in the new employment lands to be identified as needed to 2031.	Please refer to the response to Recommendations #2 and #3 (see above).
	4.2.2 Burlington Residential Growth to 2031 The Provincial Growth Plan requires that 40 percent of residential growth after 2015 within Halton be in the form of In-City development: infill, intensification, redevelopment. Phase I of the Burlington Intensification Study identifies the potential to create approximately 9700 residential units in various infill, intensification and redevelopment forms between 2006 and 2031. It is anticipated that up to 40 percent of this projected "In-City development could occur in Burlington prior to 2015, when this particular Provincial policy comes into place. Given the lack of credit given by the Province for early efforts to encourage "In-City development, this creates a potential problem for the Region in achieving the 40 percent target after 2015. The other local municipalities face challenges in achieving significant In-City development, due to servicing and environmental constraints.	
	Planning staff is of the opinion that allocation of additional In-City development units to Burlington, over the projected 9700 units identified in PL-1/08, is not reasonable for consideration at this time. Staff believe that this type of development within Burlington should be monitored in order to identify potential issues, e.g. infrastructure needs, compatibility and impact on the community, before any consideration is given to having the City's targets increased. In addition, the provision of infill, intensification and redevelopment related studies and information from the Province which was identified in the Growth Plan, e.g., Sub-area assessments, have not yet been made available to the City and Halton Region. Finally, as identified in Appendix 3, Sustainable Halton is also dealing with other policy directions pertaining to natural heritage, aggregate policies and rural areas policies. These will be reported on separately.	Please refer to the response to Recommendation #4 (see above).
	5.0 FINANCIAL MATTERS: Once a preferred Regional Growth concept is chosen it will be possible to undertake a comprehensive evaluation of the costs, e.g. infrastructure along with the other identified evaluation criteria (environmental, health and social services, etc.). At this time the Region is preparing a general evaluation of the magnitude of potential costs associated with five concepts.	A fiscal impact analysis will be prepared on all growth concepts before a preferred concept is selected by Council.

Source	SUBMISSION	Response
	6.0 ENVIRONMENTAL MATTERS: All of the concepts are based on an enhanced natural area system which will provide a high level of natural area protection and connections to both existing Urban Areas and lands within the Provincial Greenbelt.	
	7.0 COMMUNICATION MATTERS: Throughout the process to date there has been extensive public consultation by the Region in terms of public information centres, stakeholder workshops and numerous print and web based information packages.	
	8.0 CONCLUSION: Staff conclude that the various Growth Concept options do not have a significant direct impact on Burlington's urban area, based on the information currently available. The allocation of additional employment lands over the 600 hectares identified to date as needed to 2031 and land needs beyond 2031 would seem reasonable, and if this is the case, the development of rail-serviced employment lands in southwest Milton would be beneficial to Burlington residents. It would be appropriate to identify the CN Rail holding in southwest Milton on the Halton Growth Concepts and to give consideration of this location as a Special Study Area for rail-oriented employment	See previous response in section 4.2
	opportunities. Staff also conclude that it would not be reasonable for Burlington at this time to accept additional infill development to help achieve the Regional 2031 target for intensification. It is the opinion of staff that additional assessment should occur before commitment to an increased level of infill activity from the 9700 units identified earlier this year is determined.	See previous response (Recommendation #4).
Town of Halton Hills Report No. PDS-2008- 0065	Halton Hills Council Resolution A. Report No. PDS-2008-0065, dated September 16, 2008, regarding Sustainable Halton Growth Concepts. * (i) Resolution No. 2008-0189	
September 19, 2008	THAT the presentation by Sheridan Nurseries be received and forwarded to the Region of Halton for consideration as part of determining the start list of options; AND FURTHER THAT staff report back on the long-term strategy for identifying employment lands for the Town of	Please refer to the response to the Sheridan Nurseries submission – LIND Urban Land Management, on page 226).
	* (ii) Resolution No. 2008-0190 THAT whereas areas in Georgetown are essentially built out, that the Town staff and the Region include in an assessment of growth options the need to designate an employment area as part of the Georgetown Urban Expansion	Resolution (ii): The mixed-use residential identified on the growth concepts includes population related employment in addition to residential, providing employment opportunities for the potential new urban area in

Source	9	SUBMISSION	Response
	Plan in order to meet the goal of creating complete communities in addition to employment areas designated in the 401 corridor. * (iii) Resolution No. 2008-0191		Georgetown and meeting the goal of complete communities.
	THAT and replaced with:	Recommendation 11 be eliminated	
			Please refer to below responses to recommendations.
	THAT the Region be requested to respond back to the municipalities on the timeframe of the Sustainable Halton process.		Resolution (iv): Regular updates on the timeframe were provided at the Working Group Sessions. In addition the Region provided formal updates on the timeframe of the Sustainable Halton process through staff reports LPS36-08 (November 2008) and LPS27-09 (February 2009).
	REPORT TO:	Mayor R. Bonnette & Members of Council	
	REPORT FROM:	Bruce D. MacLean, Director of Planning, Development & Sustainability	
	DATE: REPORT NO.:	September 19, 2008 PDS-2008-0065	
	RE:	Sustainable Halton Growth Concepts	
	RECOMMENDATION:		
		OS-2008-0065 dated September 19, tainable Halton Growth Concepts be	
	be thanked for their comit to the Town in its process.	The public and other stakeholders ments, participation and submissions ess to formulate a response to the ble Halton Growth Concepts and the Report No. PPW 42-08;	
	that the Town of Halton additional employment	AT the Region of Halton be advised Hills is supportive of the provision of lands on the Highway 401/407 Halton Hills as set out in all of the	Recommendation #3: The refined growth concepts identify approximately 340 ha of employment lands on the Highway 401 corridor

Source	SUBMISSION	Response
	Sustainable Halton Growth Concepts as a means to improve the local non-residential to residential assessment ratio and the local activity rate (ratio of jobs to population) to 2031;	north of Steeles Avenue in Halton Hills.
	4. AND FURTHER THAT the Region consider the provision of additional serviced employment lands in the Mansewood area of Halton Hills as shown on Figure 8, and as identified in Report PDS-2008-0065;	Recommendations #4 and #5: Through regular meetings of the Sustainable Halton Working Group (comprised of Regional and Local Municipal planning staff, Public
	 5. AND FURTHER THAT in keeping with the Joint Submission from the Halton Area Planning Directors regarding the Province's Background Paper entitled <i>Planning For Employment in the Greater Golden Horseshoe</i> and Report No. PDS-2008-0055, the Region advance opportunities: PDS-2008-0065 i) to increase the additional supply of employment land for the 2021-2031 period to better match land needs with supply while ensuring choice, competition and flexibility in the land market; ii) to identify and protect strategically located employment lands beyond the 2031 planning horizon. 	Agencies, and the Province), discussions have taken place regarding the potential designation of additional employment lands to 2031. Hemson Consulting Ltd has recently completed an updated land supply analysis. Based on additional information (which included previously unavailable 2006 Census data), as well as further analysis of the type of employment development occurring in Halton, the employment land needs has been increased to a total of 1,100 hectares. The location of the 1,100 hectares of employment land has been determined in consultation with the Local Municipalities.
		The Region also recognizes the importance of protecting strategic employment lands beyond 2031 and will be providing protection through the Region's statutory five year Official Plan Review process.
	6. AND FURTHER THAT in keeping with the complete communities provisions of the Growth Plan for the Greater Golden Horseshoe Area (GGHA), as well as the general direction set out in the Town's Strategic Plan and the Halton Hills Official Plan, the Region of Halton be advised that the Town is supportive of an expansion to the Georgetown Urban Area to accommodate new residential mixed use development;	Recommendation #6: The growth concepts identify the expansion of the Georgetown Urban Area for new residential mixed use development
	7. AND FURTHER THAT Council advise the Region of Halton that a preferred scale of expansion for mixed use residential development to the Georgetown Urban area during the period of 2021-2031 be not greater than the magnitude of 20,000 estimated persons and that this amount of growth be included as part of a short list of growth options released later this year by the Region, in accordance with the following parameters:	Recommendation #7 The Region is investing the impacts of 0, 20,000 and 40,000 population in Georgetown including the financial cost, impacts on agriculture, aggregates, and a Peel based servicing option (Staff report PWE30-08). All submissions received by the public and other
	a) The Region confirming the financial and servicing	stakeholders have been included in

Source	SUBMISSION	Response
	feasibility, and the sustainability of the residential mixed use expansion; b) The expanded urban envelope be assessed on the basis of minimizing its impacts to the agricultural lands adjacent to the existing Georgetown Urban Area; c) The expanded urban envelope take into account the Strategy for Aggregate Resources developed by the Region, particularly as it pertains to the shale deposits previously identified by the Province; d) The expanded urban envelope be assessed on the basis of a greater level of detail being provided with respect to the Enhanced Natural Heritage System; e) The Region of Halton servicing investigations include options for connecting to the Region of Peel system as a means to provide the necessary servicing to the Georgetown Urban Area; and f) That any further submissions by the public and other stakeholders be evaluated in the context of confirming a preferred growth option.	this document and reviewed in the context of developing refined growth concepts. A greater level of detail with respect to the enhanced natural heritage system is provided in the technical Report 3.02 Sustainable Halton Natural Heritage System Definition and Implementation by North-South Environmental.
	8. AND FURTHER THAT the Region of Halton be requested to respond to landowner concerns regarding the Enhanced Natural Heritage System and more specifically the spatial extent of the proposed centre of regional biodiversity located in the concession block bounded by Steeles Avenue, Hornby Road, Trafalgar Road, Five Side Road, and Eighth Line;	Recommendation #8: The Region has responded to landowner concerns by developing Report 3.02 Sustainable Halton Natural Heritage System Definition and Implementation, in consultation with the Sustainable Halton Working Group and the Ecological and Environmental Advisory Committee. The request with respect to the Regional centre of biodiversity in the concession block between Steeles Ave., Hornby Road, Trafalgar Rd., 5 Sideroad and Eight Line has resulted in a modification to the location of the Regional centre of biodiversity.
	9. AND FURTHER THAT the Region consider the development of an Agricultural Strategy that complements the land use planning framework set out in the Greenbelt Plan, the Growth Plan for the Greater Golden Horseshoe and the Regional and local Official Plans in order to support the continuing role of the agricultural industry in Halton;	Recommendation #9: An Agricultural Strategy has been developed in consultation with the Sustainable Halton Working Group (comprised of Regional staff, Local Municipal Planning staff, and Public Agency staff) and Halton Agricultural Advisory Committee. The strategy sets out tools that can be used to support the continued role of the agricultural industry in the Region.
	10. AND FURTHER THAT the Region formally consult with the local municipalities, the public and other stakeholders on the short list of growth options;	Recommendation #10: The Region will be formally consulting with the local municipalities, stakeholders and the public on the growth concepts in

Source	SUBMISSION	Response
		April and May.
	11. AND FURTHER THAT endorsement of the Sustainable Halton Plan by the Town of Halton Hills is contingent upon a commitment from the Province to invest in the infrastructure and social programs necessary to serve the growing needs of Halton residents and businesses.	Through the Fairness for Halton Campaign, Halton Region and the Local Municipalities are asking that municipal infrastructure be recognized as a priority by the federal and provincial governments.
	12. AND FURTHER THAT a copy of this report be forwarded to the Region of Halton, the City of Burlington, and the Towns of Milton and Oakville, and the Minister of Municipal Affairs and Housing and the Minister of Energy and Infrastructure of the Province of Ontario, and the Region of Peel.	and provincial governments.
	REPORT PURPOSE: The purpose of this report is fourfold:	
	To briefly characterize the five regional growth concepts;	
	 To summarize the results of the Town's Facilitated Workshop held on September 8, 2008 at the Gellert Centre; 	
	To summarize any other written submissions received by the Town as of the writing of this report;	
	To provide the Region with comments and observations on the five regional growth concepts.	
	BACKGROUND: The Region of Halton in consultation with the local municipalities of Burlington, Halton Hills, Milton and Oakville are in the midst of a planning exercise known as the Sustainable Halton Plan. The Sustainable Halton Plan is intended to respond to the myriad of Provincial land use policy initiatives that have emerged over the last three years such as the Provincial Policy Statement (2005), the Greenbelt Plan (2005) and the Growth Plan for the Greater Golden Horseshoe (2006). The end product of the Sustainable Halton Plan exercise will be an updated Regional Official Plan, which is to be adopted by 2009. All four local municipalities will also have to update their Official Plans to reflect the outcome of the Sustainable Halton Plan.	
	The Sustainable Halton process, which is primarily a review of the Region's Urban and Rural Structure, is a complex undertaking, involving matters such as provincial and regional policy, urban land supply, intensification, servicing, transportation, natural heritage, agriculture, mineral aggregate resources, municipal finance, local aspirations, and public, agency and landowner input. Given that decisions have already been made regarding the spatial distribution of urban lands in Halton to 2021, this process is primarily focused on	

Source	SUBMISSION	Response
	the 2021-2031 planning period.	
	Sustainable Halton is divided into four phases as set out below:	
	Phase 1: Building Blocks - Background Papers	
	Phase 2: Regional Growth Management Options & Scenarios	
	Phase 3: Preferred Growth Management Option	
	Phase 4: Regional Official Plan Review	
	As part of Phase 2, the Region released five growth concepts and a final Evaluation Framework through Report PPW42-08 in June 2008. The Region has requested comments on the five growth concepts in general and more specifically in the context of seven questions by the end of September in order to assist in establishing a short list of two or three options for more detailed analysis. Ultimately, the intent is to arrive at a preferred growth option in early 2009 as the basis for an updated Regional Official Plan.	
	At the July 14, 2008 Council meeting, the Mayor announced that the Town would be holding a Public Information Centre and Facilitated Workshop in order that the public could discuss and provide submissions on the five growth concepts. It was also noted that a Special Council meeting would be held on September 24, 2008 to consider a staff report setting out a recommended position on the growth concepts.	
	The August 11, 2008 Council meeting saw the release of the Sustainable Halton Growth Concepts Discussion Paper and covering staff report PDS-2008-0059. The purpose of the Discussion Paper was to provide Council and the public with appropriate background information regarding Sustainable Halton as well as preliminary observations on the five growth concepts in the context of the seven questions posed by the Region as well as the broad framework provided by the Town's Strategic Plan, prior to the facilitated public workshop.	
	The Public Information Centre and Facilitated Workshop was subsequently held at the Gellert Centre on September 8, 2008. A separate Public Information Centre was conducted by the Region on September 16, 2008 at the Georgetown District High School.	
	The Growth Concepts As Council may recall, the five growth concepts are premised on the following assumptions:	
	40% of all new residential units will be located inside the built boundary as of 2015 in accordance with the	

Source	SUBMISSION	Response
	Growth Plan;	
	The amount of new urban land required is approximately 3,000 hectares (7,413 acres) which comprises 19% of the lands within the Primary Study	
	Area or 28% of the lands that are considered to have development capability;	
	 Lands on both sides of Highway 401 in Halton Hills and Milton have been prioritized for accommodating additional employment lands; 	
	New residential/mixed use lands should be an extension of existing communities;	
	 The major focus for new greenfield growth between 2021 and 2031 will be the Town of Milton with Halton Hills share ranging from 0% to 38% of new residential and population related employment growth; 	
	 A substantial amount of the Primary Study Area will continue to be designated for agricultural purposes, particularly in the Town of Halton Hills; and; 	
	 An Enhanced Natural Heritage System intended to protect and link natural heritage features such as wetlands, woodlands and watercourses will be provided. 	
	A brief summary of the concepts is provided below.	
	The Primary Study Area refers to lands in the Town of Halton Hills and the Town of Milton that are outside of approved urban areas and the Greenbelt Plan Area, with the exception of certain linear extensions of the Greenbelt Plan Area.	
	• Concept 1: Milton Centred The Milton Centred Concept entails locating all of the residential and mixed use land in the Town of Milton (see Figure 1). Under this concept most of the Primary Study Area within Milton would be urbanized. More specifically, the Milton Urban Area would be expanded:	
	 southerly between two branches of the Sixteen Mile Creek towards the Town of Oakville; to the east of Sixteen Mile Creek to the Ninth Line Corridor adjacent to the City of Mississauga. 	
	Lands west of Tremaine Road and north of Britannia Road would also be included in the expanded Milton Urban Area. Summary information related to Concept 1 is contained in Table 1.	

Source	SUBMISSION	Response
	• Concepts 2A and 2B: Milton and Georgetown (Low) Two concepts have been prepared that allocate approximately 20,000 new residents adjacent to the Georgetown Urban Boundary in different spatial configurations. Concept 2A (South Georgetown) would locate growth south of Ten Side Road between the Eighth Line and Levi Creek being a component of the proposed Natural Heritage System, to the east of the Tenth Line (see Figure 2).	
	Concept 2B (Southwest Georgetown) generally locates growth within the concession block bounded by the 15 Side Road, the Eighth Line, 10 Side Road and Trafalgar Road (see Figure 3). In both concepts, the balance of the residential and mixed use lands would be located in the Town of Milton with a reduced amount of land designated east of Sixteen Mile Creek to generally maintain the overall Regional urban land budget of 3,000 hectares.	
	Summary information related to Concepts 2A and 2B is contained in Table 1.	
	Concepts 3A and 3B: Milton and Georgetown (High) Two concepts have also been prepared that allocate approximately 40,000 new residents adjacent to the Georgetown Urban Boundary in different spatial configurations. Concept 3A (ROPA No. 25 Deferral 1 and Deferral 2 Areas) would distribute growth over three concession blocks. The Deferral 1 lands (South Georgetown) are bounded by 10 Side Road, Trafalgar Road, 5 Side Road and the Ninth Line. The Deferral 2 (Southwest Georgetown) lands are bounded by 15 Side Road, Trafalgar Road, 10 Side Road and the Eighth Line (see Figure 4).	
	Concept 3B (Southwest/South Georgetown), which is largely a combination of Concepts 2A and 2B, would "wrap" growth around the existing western and southern Georgetown Urban Boundary and where possible utilize the Enhanced Natural Heritage System to define the edges of the expanded urban boundary (see Figure 5).	
	In both concepts the balance of the residential and mixed use lands would be located in the Town of Milton. In order to maintain the overall Regional land budget of 3,000 hectares, there are no lands designated for urban purposes east of Sixteen Mile Creek.	
	Summary information related to Concepts 3A and 3B is contained in Table 1.	
	In all five concepts, new employment lands are distributed on both sides of Highway 401 in Halton Hills and Milton. Concept Five does entail a conversion of a portion of Milton's Derry Green Corporate Business Park to residential/mixed use and	

Source	SUBMISSION	Response
	the identification of replacement employment lands near James Snow Parkway in the Town of Milton.	
	COMMENTS: 1. Halton Hills Public Information Centre and Town Facilitated Workshop The Halton Hills Public Information Centre and Town Facilitated Workshop was held at the Gellert Centre on September 8, 2008. The workshop presented an opportunity for facilitators to lead workshop participants distributed over 12 tables to randomly examine a minimum of all of the five	
	regional growth concepts in the context of the seven questions posed by the Region. Where time permitted, participants also examined all of the other concepts. All of the input was written down on flip charts by a recorder. Participants included local residents from Georgetown and the rural area including those interested in sustainability and the environment, representatives from the Chamber of Commerce and the Georgetown Business Improvement Association, and	
	landowner/developer interests. Members of Council monitored the proceedings but did not directly participate in the group discussion. Planning staff acted as resource to clarify any questions that participants had over the course of the evening. a) Workshop Record The Workshop Record has been prepared in tabular form and is attached to this report as Schedule One. Some of the key themes gleaned from participants at the workshop with respect to the growth concepts are listed below in section a), as well as returned written comment sheets in section b):	
	Concept 1 Milton Centred	
	Halton Hills should accept some growth for such reasons as:	
	 Growth should be balanced between Milton and Halton Hills; Acceptance of some population growth is necessary to ensure Halton Hills is allocated some employment growth. 	
	Concept 1 does not address all aspects of a complete, healthy, sustainable community, and in particular the provision of an affordable supply and mix of housing (e.g. seniors housing).	
	Concept 1 maintains good urban separators between Halton Hills, Milton and Brampton, except in the area of the 401 Corridor, because growth is limited to employment lands adjacent to the 401 Corridor.	
	The 401 corridor is the best location for employment lands, but Concept 1 does not encourage economic prosperity, as it does not provide any residential growth and not enough employment growth.	

Source	SUBMISSION	Response
	Concept 1 adequately addresses the need for new residential and employment lands in the Region as a whole, but not in Halton Hills. Halton Hills needs some residential lands, and according to some, more employment lands.	
	Concept 2A Milton and South Georgetown	
	This concept protects permanent landforms by situating the proposed urban expansion area adjacent to Georgetown.	
	This concept has the potential to meet the goals of sustainable development, if required infrastructure is planned for first, and appropriate design measures are utilized.	
	This concept provides adequate housing, but would need to have commercial development and community infrastructure linked to serve pedestrians in order to create a complete community.	
	The 401 corridor is the best location for employment lands, and Concept 2A does encourage economic prosperity, but would rank better if additional employment lands could be provided.	
	Concept 2A adequately addresses the need for new residential lands and additional population (i.e. 20,000) in Halton Hills, but more employment land is needed to correct imbalance of population to employment.	
	Concept 2B Milton and Southwest Georgetown	
	This concept generally protects permanent landforms.	
	This concept maintains good urban separators between Georgetown and Milton.	
	Concept 3A Milton and ROPA 25 Settlement Area	
	This concept protects permanent landforms, but does involve greater loss of farmland and encroaches more into the natural heritage system, than Concepts 1, 2A and 2B.	
	This concept maintains urban separators between Halton Hills and Milton and Brampton.	
	The 401 corridor is the best location for employment lands, but this concept does not contain enough employment lands.	
	This concept contains too much residential land relative to employment land, thereby exacerbating the imbalance	

Source	SUBMISSION	Response
	between residential and employment.	
	Concept 3B Milton and South/Southwest Georgetown	
	This concept involves greater loss of farmland and encroaches more into the natural heritage system than Concepts 1, 2A and 2B.	
	The rate or amount of growth is too much to achieve a healthy society.	
	With respect to the creation of complete, healthy, sustainable community, the amount of employment land is not sufficient to support the large amount of residential land.	
	The urban separator with Brampton is removed in this concept.	
	The concept does encourage economic prosperity.	
	b) Public Comment Sheet Responses In addition, eight public and stakeholder attendees filled out the Comment Sheet, which asked stakeholders to comment on the relative merits of the five concepts. Two of the submissions only responded to one of the five concepts. One submission focused on increasing the amount of employment lands in the Town to improve the tax base along with concerns regarding the spatial extent of the natural heritage lands to be protected. Another submission was primarily focused on Milton and noted that additional employment was required in that municipality to better balance the residential growth in that municipality.	
	Six of the submissions expressed a preference for a particular concept with Concept 2B (Milton and Southwest Georgetown) being selected by four; and Concepts 1 (Milton Centred) and 3A (Milton and ROPA No. 25 Settlement Area by one each. The detailed comments are contained in a matrix attached to this report as Schedule Two.	
	2. Written Submissions Aside from the Facilitated Workshop and the comment sheets referenced above, a number of written submissions have been received on the five growth concepts. The various submissions are highlighted below.	
	a) Chamber of Commerce Submission The Chamber of Commerce has indicated that it is supportive of concepts that entail a growth increment in the 20,000 range in conjunction with additional employment lands along the north side of Steeles Avenue. The Chamber has not expressed a preference between the two concepts that would allocate this magnitude of growth to the Town but has	The Region has also received a submission from the Chamber of Commerce. Please refer to page 99 of this document

Source	SUBMISSION	Response
	provided some comparative observations. With respect to Concept 2A, the Chamber has advised that "residents gaining employment in Halton Hills in the new employment lands would have a shorter private automobile commute and perhaps contribute to mitigating environmental impacts of new development and the carbon footprint brought on by urban growth. There may be energy cost savings associated with short commutes by automobile". With respect to Concept 2b, the Chamber advises that "there may be a greater positive impact on the use of potential employment lands around the Georgetown GO Station, and stimulation of the Georgetown historical town centre in the context of a GO extension to Guelph and Kitchener. In addition, Concept 2b may enhance the redevelopment of the GO Station lands and public transportation in light of rising energy costs and improved public transit. This is not to say that Concept 2a would contribute any less to the success of the downtown core and the GO Station lands, only that close proximity of large population areas to such facilities, generally increase use". The Chamber has also indicated support for intensification in existing urban areas, while recognizing that the Town cannot accommodate all of the growth needs in Sustainable Halton. With respect to employment lands, the Chamber is supportive of "the location of new employment lands along the north side of Steeles Avenue from Hornby to Winston Churchill Boulevard, and would strongly endorse additional employment lands in relation to the employment lands of the Bram West Secondary Plan and the Bram West Parkway. It would also support new employment opportunities in the new plazas of both concepts, and recognizes that approval of either of the concepts could benefit existing businesses in Halton Hills". The Chamber is also of the view that lake based servicing is inevitable to support intensification and greenfield development in the Town of Halton Hills.	
	Commons) Submission The South Georgetown landowners have submitted a revised concept referred to as the "Balanced Growth Concept". This concept, which is a variation of Concept 3A, is premised on "the ongoing economic importance of the Highway 401 Corridor for future employment uses and the need to develop geographically appropriate residential and mixed use urban growth while seeking to maximize the potential of existing and proposed infrastructure. The most effective way to accomplish this objective is through "balanced" growth, encouraging simultaneous employment and residential/mixed use growth north and south of Highway 401". The Concept entails an initial growth phase of 3,239 hectares of urban land of which 772 hectares are for employment uses and 2,467 hectares are for residential/mixed uses. For new employment, the Concept shows a distribution of 340 hectares to Halton Hills accommodating 17,000 jobs and 432 hectares	The Region has also received a submission from the South Georgetown Landowners Group. Please refer to page 104 of this document

Source	SUBMISSION	Response
	to Milton accommodating 21,600 jobs. For residential/mixed use growth the Concept adds 984 hectares to Halton Hills accommodating an additional population of approximately 49,200 and 1,483 hectares to Milton accommodating an additional population of approximately 74,150 (see Figure 6). The submission also advises that "the Balanced Growth Concept responds most appropriately to the Sustainable Halton Evaluation Framework as well as the objectives embodied in the Province's guidelines in its Places to Grow policy and its Provincial Policy Statement (2005)".	
	c) Smart Centres Submission Smart Centres is the agent for Georgetown Shopping Centres limited (GSCL), the owner of a 20 hectare parcel of land located at the southeast corner of the intersection of 10 Side Road and the Ninth Line immediately south of the Georgetown Urban Boundary (see Figure 7). In a submission dated September 10, 2008, Smart Centres has indicated that "the GSCL site is within an area that should be identified for future urban growth". The submission further advises that "the existing population (residents of Georgetown and the Town of Halton Hills) is underserviced in terms of retail and service commercial space. It is therefore Smart Centres' opinion that the GSCL Site should be brought into the Urban Area to provide additional retail and service uses to existing Georgetown and the Town of Halton Hills residents, regardless of the growth concept recommended". The submission also notes that Georgetown is lacking vacant designated lands within the existing urban boundary which could accommodate this type of commercial use.	The Region has also received a submission from Smart Centres. Please refer to page 185 of this document.
	 d) Maple Mist Development Corporation Submission Maple Mist Development Corporation owns approximately 41 hectares (102 acres) of land located east of the Eighth Line between 5 Side Road and Steeles Avenue (see Figure 7). On behalf of Maple Mist, Wellings Planning Consultants Inc. has submitted a letter dated September 3, 2008 that expresses concerns with: The conclusion "that the Maple Mist lands remain Agricultural in the long term in conjunction with a "Continuous Farmland Connection to the Greenbelt" 	The Region has also received a submission from Maple Mist Development Corporation Please refer to page 121 of this document.
	 • Lack of recognition for future urban lands that will be required by longer-term growth and the potential for an insufficient amount of urban land necessary to accommodate growth as part of the current Sustainable Halton exercise". The submission advises that 3,000 or even 4,200 gross hectares of urban land may not be sufficient "given the uncertainty with respect to net developable areas, ability to achieve projected growth targets and the extent of natural 	

Source	SUBMISSION	Response
	heritage features/enhanced natural heritage system." The submission also advises that consideration should be given to the provision and protection of up to 4,200 hectares "either through the enlargement of urban land within the refined concepts under discussion or alternatively through a policy framework and the identification of lands outside the refined concepts as "Future Urban". It is further suggested that the Maple Mist lands be identified as Future Urban.	
	e) Georgetown Business Improvement Association (BIA) The Georgetown BIA has provided the Town with the following preliminary submission, after a meeting of some of its members, with information on Sustainable Halton and the five concepts provided by Town planning staff:	Comments noted.
	 A minimal expansion of population growth of an additional 20,000 people in order to ensure a financially balanced community is recommended; It was preferred that the expansion of the current boundaries be made in an east/west fashion rather than to the south towards the 401 and Milton. It was felt that east/west would provide more centricity and connection with the existing town and in particular the downtown Georgetown area; While it was not mandatory that a single growth concept be selected, the preference was for Concept 2B. 	
	f) Other Written Submissions Three other written submissions have been filed with the Planning, Development and Sustainability Department. One submission prefers Concept One – no growth - to keep the small Town feel which the resident has enjoyed for the last 40 years.	
	Another submission is concerned with the damage associated with excessive growth vis a vis crime, gangs, traffic and depressed housing prices, citing Brampton as an example. The submission also suggested that an urban expansion will have an adverse impact on housing prices in Georgetown. The third submission suggested that Concept One would be the most preferable, however, there were questions raised regarding Milton's ability to accommodate all of the growth. As such, Concepts 2a or 2b are seen as the best alternative with a plan for slower, steadier growth being seen as ideal. The submission also suggested that if the Town decides for faster growth rates, Oakville and Mississauga are models to consider rather than Milton.	
	3. The Regional Questions The Region has requested that local municipalities comment on the growth concepts in the context of the following questions.	
	Do they capture Halton's Planning Vision of landform	

Source	SUBMISSION	Response
COMOL	permanence? 2. Do they meet Halton's definition of sustainable development? 3. Do they promote complete, healthy and sustainable communities and the adequate provision of housing? 4. Do they adequately capture the concept of urban separators? 5. Do they encourage economic prosperity and is the Highway 401 corridor the best location for new	TREST STIES
	employment? 6. Do they promote sustainable infrastructure? 7. Do they adequately address the need for new residential and employment lands?	
	As noted in the Discussion Paper, the regional questions are broad in scope and perhaps can only be answered in a more fulsome manner once the results of on-going studies pertaining to such as the Land Evaluation and Area Review (LEAR) and the Aggregate Strategy, particularly as it relates to the shale drilling program on lands between Georgetown and the 401 Corridor, are available. Information regarding servicing feasibility is also desirable.	Report 3.02: Sustainable Halton Natural Heritage System Definition and Implementation, the Agricultural Countryside Strategy report (Report 3.04) and the Aggregate Strategy (Report 3.05) are now available.
	The key points previously made by staff in the discussion paper of August 2008 regarding the seven questions can be summarized as follows:	
	a) Landform Permanence All concepts entail essentially the same amount of urban land with the majority of the Primary Study Area being intended to remain in the Rural system therein capturing the principle in various degrees. The preciseness of the area involved will emerge through the short list and the preferred options stage.	
	b) Sustainable Development All of the five concepts are predicated on minimizing the amount of additional greenfield lands, achieving the minimum intensification target established by the Province and providing for additional employment opportunities along the 401 Corridor. In addition, all of the concepts are based on an Enhanced Natural Heritage System. These principles can be seen as key elements of sustainability. Where the concepts differ is the distribution of growth between Milton and Halton Hills. Concept One, which essentially entails no additional residential growth in Halton Hills, raises issues regarding community and economic vitality as well as the directions that underpin the Town's Strategic Plan.	
	c) Urban Separators All of the concepts provide, to varying degrees, urban separators between Milton and Georgetown which would be recognizable on the landscape. Concept 1 would extend mixed-use/residential lands in Milton easterly to about the	

Source	SUBMISSION	Response
Source	Ninth Line Corridor which may be seen as connecting Milton and the Mississauga. This interface is also present to a lesser extent on Concept 2A and 2B. This connection may, however, be mitigated by the limited development capability within the Ninth Line Corridor. Concept 3B does not provide an urban separator along the interface of the Georgetown Expansion Area and the City of Brampton although one is maintained further to the south. No urban separators per se are provided between the 401-407 Employment Corridor (existing designated lands and proposed expansion) and the City of Brampton. As part of the 401 Integrated Planning Project it was concluded that the provision of an urban separator would have resulted in increased servicing costs with impacts on the financial viability and competitiveness of the Corridor. Accordingly, it was determined that the major tributary systems of Sixteen Mile Creek as well as the protection and enhancement of other natural and cultural heritage features, in conjunction with development setbacks would be utilized to distinguish the 401 Corridor from Milton and Brampton. Whether this approach should be carried forward and applied to a northerly expansion of the Corridor should be further considered as the process continues to unfold. d) Employment Lands and Economic Prosperity Opportunities for new employment have been identified on either side of Highway 401 in both Halton Hills and Milton. This	Please refer to the response to Recommendation #4 and #5
	could build on the momentum created to date along this strategically located corridor in Halton and Peel Regions and is considered to be appropriate. Another location that has merit in the context of close proximity to Highway 401 is the Mansewood area located on the north side of Campbellville Road in Halton Hills, bordering on Milton (see Figure 8). The Region should also consider the merits of including these lands for employment purposes when developing a short list of growth options. In addition to the foregoing and as set out in the Joint Submission from the Halton Area Planning Directors regarding the Province's Background Paper entitled <i>Planning For Employment in the Greater Golden Horseshoe</i> and Report No. PDS-2008-0055, concerns have been expressed whether 600 hectares of additional employment land between 2021-2031 is	Recommendation #4 and #5
	adequate vis a vis optimal live work relationships, the low density nature of employment uses in Halton and the nature of some of the residual employment land supply. In this regard, most Halton municipalities including the Town, have employment lands which are faced with a host of challenges such as small or irregular shaped parcels associated with mature industrial areas, landowner disinterest or land banking, parcel fragmentation that can hinder front end financing and/or viable development opportunities and/or severe servicing	

Source	SUBMISSION	Response
	constraints.	
	By way of example, the Town's employment land supply has to be considered in the context of location and servicing issues. It is uncertain whether the vacant employment lands in Acton can be serviced or whether only low intensity dry industrial uses will be permitted. Given the foregoing and taking into account Acton's geographic location within the Greenbelt Plan Area and the distance from the Provincial expressway system, Acton is not anticipated to play a major role for accommodating future employment opportunities. The Georgetown Industrial Area is a mature employment area with limited opportunities for additional development. The Rural (Mansewood Area) does not have access to full municipal services. As previously noted only the western part of the 401-407 Employment Corridor is serviced with further servicing extensions contingent upon an acceptable Environmental Assessment and financial plan.	
	Based on the foregoing, the Region should explore opportunities to increase the additional supply of employment land for the 2021-2031 period to better match land needs with supply while ensuring choice, competition and flexibility in the land market. Opportunities to identify and protect strategically located employment lands beyond the 2031 planning horizon should also be considered.	Refer to response earlier in this submission (see Recommendations).
	e) Residential Land Needs The total quantum of additional residential units required to 2031 inside the built boundary through infill and intensification and in designated Greenfield areas was canvassed as part of Phase 1 of Sustainable Halton. As noted in PPW42-08, the intensification numbers established by the Province are challenging and it will be difficult to achieve the 40 percent intensification target. On a comparative basis it is anticipated that Burlington and Oakville will be the focus for intensification relative to a variety of factors such as location, size of the urban envelope and the depletion of greenfield lands supply after 2021. The Town of Halton Hills' smaller urban envelopes, character, geographic location and servicing constraints are limiting factors when compared against a number of other municipalities within the Greater Toronto Area and suggest a more minor role for accommodating intensification. The Town is currently in the midst of a GO Station Land Use Study and an Intensification Opportunities Study both of which will further inform the intensification component of Sustainable Halton.	
	f) Sustainable Infrastructure	
	The major issue raised under this question by staff was the need for certainty with respect to servicing. Both the Communities of Acton and Georgetown have a long history with servicing constraints which has proven at times to be an	

Source	SUBMISSION	Response
	impediment to the Town's planned growth, vibrancy and prosperity. Although well and stream based servicing investigations are underway in both communities, there is no certainty with respect to outcome. With respect to well based water supply, for example, it is noted that the Ontario Water Resources Act and regulations governing water taking have evolved over time. Investigations to support applications to take water have evolved from simple well capacity and interference with other groundwater users, to multi-disciplinary studies that include ground water science, surface water assessment, wetland ecology and fish habitat.	
	Recognizing the foregoing, all of the growth concepts are premised on lake based services unless other information and proven options are available and confirmed by the regulatory approval agencies. To the extent that growth is directed to the Town, the provision of lake based services may have the potential to be joined with the Town's interest in having a municipal water system that provides security to existing and planned growth in Georgetown and which serves the existing community for emergency purposes. This position is outlined in greater detail in the Sustainable Halton Growth Concepts Discussion Paper (August 2008) and has led the Town to position itself to ensure that "vitality" and "community security" to support the choices and needs of the Town and the Community of Georgetown are paramount. The Town's prosperity should not be undermined by sole reliance on a well and stream based system should it not come to fruition to meet growth expectations of the Town for 2031.	
	To this end, staff has included a recommendation in the report highlighting that servicing connections to Peel should be investigated as an option to consider in conjunction with other alternatives, including Halton exhausting its investigation of the possibility of utilizing the well and stream based systems in Georgetown for both approved intensification and expanded urban boundary growth. The proximity of the Peel municipal servicing system to Halton Hills, lends itself to an investigation to evaluate it as an option.	Refer to response earlier in this submission (see Recommendations).
	Staff also note that the GO Transit – Georgetown to Kitchener Rail Corridor Environmental Assessment, including the potential for all day service is a further consideration vis a vis the growth concepts.	
	Staff has included a recommendation which proposes that the Province of Ontario be a participant in providing needed infrastructure and services as part of a partnership effort in community building. This point is emphasized by virtue of the Provinces Growth Plan to build complete communities. The example Town staff would use to illustrate this point would be additional impacts that growth would create on the hospital and other human service delivery sectors.	Refer to response earlier in this submission (see Recommendations).

Source	Submission	Response
	g) Complete Communities and Adequate Supply of Housing The Growth Plan defines a complete community as follows: Complete Communities meet people's needs for daily living throughout an entire lifetime by providing convenient access to an appropriate mix of jobs, local services, a full range of housing, and community infrastructure including affordable housing, schools, recreation and open space for their residents. Convenient access to public transportation and options for safe, non-motorized travel is also provided. From a local perspective, Concept One is not in keeping with the foregoing definition. Typically, municipal planning exercises seek to provide for a complete mix and range of	
	Iand uses. One of the cornerstones of the Town's new Strategic Plan is the Strategic Direction of "Ensure Sustainable Growth" and, this strategic direction is further defined, in part, by a series of strategic objectives. From a community structure perspective, the following strategic objectives are of particular note: • To provide for a moderate scale of growth that is in keeping with the Town's urban and rural character.	
	 To ensure that all new urban areas are appropriately sized and phased relative to planned growth to 2031 and in conjunction with required infrastructure improvements. To ensure that the pace of growth is in keeping with the 	
	Town's ability to accommodate community infrastructure. • To ensure that sufficient fully serviced employment lands are designated to 2031 to provide new and expanded business activities that provide employment opportunities for local residents and a greater balance between residential and non-residential assessment.	
	To provide opportunities for intensification and affordable housing in appropriate locations within the Town. To recognize and promote the role agricultural lands.	
	 To recognize and promote the role agricultural lands play in managing growth and defining structure. The aforementioned objectives suggest that additional employment and population envisaged in the Town after 2021 to 2031 with the latter being accommodated through intensification and new Greenfield lands. Although the exact magnitude of growth could not be defined in context of the Town Strategic Plan, the Plan's direction has suggested that growth should be of a moderate scale and reflective of the 	

Source	SUBMISSION	Response
	Town's character.	
	4. General Observations on the Growth Concepts The Discussion Paper provided some preliminary observations on the growth concepts in the form of a matrix in the context of the Town's Strategic Plan. These observations are attached to this submission as Schedule Three. In addition to the foregoing, staff provides the following comments on the Growth Concepts from a local perspective.	
	a) Concept One – Milton Centred This concept entails the least amount of agricultural land lands being converted for urban purposes in the Town, maintains the current Town structure and provides substantial urban separators between Georgetown and the 401 Corridor, Milton and the City of Brampton. A high activity rate in the range of 70% may be targeted and the long-term fiscal impacts are considered to be positive, however the activity rate may not be achievable.	
	However, the concept would see limited residential growth after 2016 with some degree of population decline anticipated post 2021 due to declining household size as the community begins to age in place. Housing supply would be limited to that which can be achieved through infill and intensification inside the existing built boundaries. Infill and intensification opportunities may be further limited by servicing constraints. In a local context, there would be limited housing choices with the potential for price increases and related affordability issues to emerge.	
	Further expansions to the commercial inventory will be limited due to the absence of large vacant parcels designated for commercial development as well as overall growth, land supply and servicing constraints.	
	Council should be aware that the Town of Milton has indicated that additional employment lands are necessary within that municipality to balance anticipated residential growth and maintain at least a 50% activity rate. Three locations for additional employment lands within Milton have been identified by their staff, being adjacent to the north-south and east-west sections of Highway 407 and near the CN Rail line in southwest Milton. The latter location is also supported by the City of Burlington staff. Given the foregoing, without an increase to the regional employment land budget which could support these additional areas, the securing of a standalone employment land option in Halton Hills may face significant challenges.	
	b) Residential/Mixed Use & Employment Concepts (2A, 2B, 3A and 3B) The Regional concepts entail approximately 20,000 and 40,000 residents being allocated to the Town around the	

Source	Submission	Response
	Community of Georgetown. The difference between the magnitude of growth associated with the concepts is one of scale and pace. Concepts 2A and 2B entail the Town being allocated approximately 15 % of the region wide population growth to be accommodated in new greenfield areas. Residential growth would be in keeping with the historical absorption rates observed in the Town over the last ten years; the compounded annual growth rate of 2 % would be lower than the 1991-2006 period.	
	Concepts 3A and 3B entail the Town being allocated approximately 35-38 % of the region wide population growth to be accommodated in new greenfield areas. Both concepts entail increased absorption rates and a higher rate of growth relative to historic performance. In general terms and in keeping with intent of the Strategic Plan, staff is suggesting that Council advise the Region that an urban expansion to Georgetown for Residential/Mixed use purposes can be supported. Staff has provided a recommendation to this effect.	Refer to response earlier in this submission (see Recommendations).
	In addition, staff is of the opinion that the scale of growth associated with Concepts 2A and 2B is consistent with the past and existing growth trends within the Town and therefore would provide the Town with a plan that allows this trend to be advanced to 2031. Staff would suggest that this can be viewed as a "best fit" with community expectations about the character of the Town, the community aspirations, with the Town's respective network of communities and the directions referenced in the Town Strategic Plan.	Comments noted
	In contrast, staff observe that the scale of growth associated with Concepts 3A and 3B will require the Town and the community to alter their expectations about the character of the Town in a manner that to many may prove challenging. With the foregoing in mind as a next step in clarifying its position to the Region, Council now has an opportunity to outline a framework of expectation for growth which will allow the Region to partner with the Town.	Comments noted
	To this end staff recommend that Council advise the Region of the Town's preference for an urban expansion to Georgetown of residential/mixed use area at a scale that has a magnitude of growth not greater than 20,000 estimated persons as a basis in which to formulate a short list of growth options. This proposed direction is qualified with six requirements that are intended to address a range of issues wherein more detailed responses from the Region are required. These requirements include minimizing impacts on agricultural lands, the identification and potential refinement of the natural heritage system, continuing to evaluate public and stakeholder submissions, and information needs with respect to financial and servicing implications.	Refer to response earlier in this submission (see Recommendations).
	5. Tenth Line/10 Side Road Lands - Georgetown/Norval	

Source	SUBMISSION	Response
	Area None of the five concepts include lands located on the north side of 10 Side Road located between the current Georgetown Urban Boundary and the Hamlet of Norval. The location of these lands, which form part of Deferral 3 (D3) in both the Regional and Halton Hills Official Plan, are shown on Figure 9. The lands have previously been identified as potential site for a component of the Georgetown/Norval By-pass, specifically the connecting link between Highway 7 and a realigned 10 Side Road.	The lands in question, located on the north side of 10 Side Road between the current Georgetown Urban Boundary and the Hamlet of Norval, have been identified for mixed-use/residential development in those options where population growth has been identified for Halton Hills.
	The subject lands are of a small scale and could be further considered in the context of all of the Georgetown expansion concepts. Concepts 2A and 3B, for example, propose new residential mixed use lands in close proximity to these lands on the opposite side of 10 Side Road. Although more geographically more remote from the lands subject to Concepts 2B and 3A, the inclusion of this area may be seen as part of a logical rounding of the Georgetown Urban Boundary. These lands could be further considered as this process continues to unfold in the context of any implications for the Georgetown/Norval By-pass as well as measures that may be necessary to ensure that the character of the Hamlet of Norval is maintained.	
	6. Hamlet of Stewarttown The Region and the Town have received correspondence from Glen Schnarr and Associates regarding the Atkinson/DePaoli properties that are immediately adjacent to the Hamlet of Stewarttown and further bounded by the CN Railway line and 15 Side Road. These lands are included within Deferral 3 to the Regional Official Plan and the Halton Hills Official Plan. The submission notes that the subject lands constitute approximately 50 acres of developable table land which should be included as part of the existing Hamlet of Stewarttown or considered as a minor rounding out of the Georgetown Urban Area. Figure 10 shows the location of the subject lands in relation to the Hamlet of Stewarttown.	See response to submission by Glenn Schnarr for Atkinson/DePaoli on page 125 of this document.
	The Hamlet of Stewarttown, along with Glen Williams and Norval are unique in a Halton Region context by virtue of their spatial location immediately adjacent to the Georgetown Urban Area and a policy framework that permits full municipal services when the Region, in consultation with the Town, considers it prudent and feasible to extend such services. Although Stewarttown is confined in part by the Greenbelt Plan, the southern boundary is adjacent to areas where development pressures are particularly acute. As such, one option would be to incorporate Stewarttown, including the Atkinson/DePaoli lands within the Georgetown Urban Boundary, with further detailed land use planning to be undertaken at the local level.	

Source	SUBMISSION	Response
	The second option would be to consider the request in the context of the Hamlet expansion policies set out in the Regional and Halton Hills Official Plan. In this regard, the preparation of a new Secondary Plan for the Hamlet of Stewarttown, supported by appropriate studies including the Black Creek Subwatershed Study is identified in the Halton Hills Official Plan, the Town's Capital Forecast and through detailed Strategic Actions associated with the Strategic Plan. Factors such as location, the limited development capability and the character of the surrounding area may suggest that the request be further considered as part of this exercise. This has to be weighed against previous Provincial comments that any expansion to Stewarttown has to be considered in the context of the Growth Plan. Staff recommends that the Town engage the Region in further discussions regarding the most appropriate course of action for addressing the Atkinson/DePaoli submission in keeping with the options presented above. 7. Enhanced Natural Heritage System As previously noted, all of the growth concepts are predicated on the provision of an Enhanced Natural Heritage System. Aside from lands already included within the Greenlands System and Candidate Significant Woodlands, the Enhanced Natural Heritage System includes "successional communities and agricultural lands intended for ecological restoration in order to identify sufficiently large core areas and functional ecological connections intended to achieve long term protection and enhancement of biodiversity and the ecological functions necessary for ecological integrity". The Enhanced Natural Heritage System includes the "creation of large regional centres of biodiversity, the incorporation of alternative connections and the recommendation for substantial wildlife crossings at major barriers". These elements are seen as "necessary to provide the present and future residents of Halton with representative examples of the Region's natural heritage".	
	At the September 8, 2008 Public Information Centre/Facilitated Workshop, concerns were expressed by some landholders regarding the spatial extent of the Enhanced Natural Heritage System, particularly the proposed centre of regional biodiversity located in the concession block bounded by Steeles Avenue, Hornby Road, Trafalgar Road, Five Side Road, and Eighth Line relative to the natural features present within this area. Staff recommends that the Region be requested to formally respond to these concerns. 8. Agricultural Lands	Refer to response earlier in this submission (Recommendation #8).
	As previously noted, all concepts entail the inclusion of approximately 28% of the Primary Study Area in Halton within	

Source	SUBMISSION	Response
	an expanded urban envelope. The obvious corollary is that a substantial amount of lands will continue to be designated for agricultural purposes to 2031 regardless of which growth option is ultimately selected. These lands are augmented by lands within the Greenbelt Plan which are permanently protected from urbanization.	
	Aside from Agricultural/Countryside Vision developed as part of Phase One of Sustainable Halton, the Region is undertaking a Land Evaluation and Area Review (LEAR) to further characterize the agricultural land base in both the Primary Study Area and the Greenbelt Plan Area. The protection of the land base, however, is only a component of a viable agricultural sector and should be complemented by other non-land use planning initiatives. The GTA Agricultural Action Plan represents a starting point as it deals with matters such as economic development, education and marketing. In order to complement the land use planning framework and the GTA Agricultural Action Plan, the development of an overall "Made in Halton Agricultural Strategy" should be further considered by the Region.	We agree that the protection of the land base is only a component. See earlier comments relating to the Agricultural Strategy.
	RELATIONSHIP TO STRATEGIC PLAN: The Strategic Plan sets out a broad vision for the community contained in eight strategic directions. This report relates extensively to the following Strategic Directions:	
	 Foster A Healthy Community Preserve, Protect and Enhance our Environment Foster a Prosperous Economy Preserve, Protect and Promote our Distinctive History Preserve, Protect and Enhance our Countryside Achieve Sustainable Growth Provide Sustainable Infrastructure & Services Provide Responsive, Effective Municipal Government 	
	FINANCIAL IMPACT: There is no financial impact associated with the preparation of this report. COMMUNICATIONS IMPACT:	
	A copy of this report should be forwarded to the Region of Halton, the City of Burlington and the Towns of Milton and Oakville, the Ministry of Municipal Housing and Affairs, the Ministry of Energy and Infrastructure of the Province and the Region of Peel. ENVIRONMENTAL IMPACT: Environmental considerations are extensively referenced in the Sustainable Halton Evaluation Framework, including but not limited to the protection and enhancement of a Natural	
	Heritage System (NHS). CONSULTATION: The Town held a Public Information Centre and a Facilitated Workshop to obtain public and other stakeholder input on the	

Source	SUBMISSION	Response
	five growth concepts. The record of the facilitated workshop is attached to this report as Schedule One, and a record of the public comments from the Town comments sheets are attached as Schedule 2. The contents of this report have been discussed with the CAO, Department Heads, and the Town Solicitor. CONCLUSION: This report has:	
	 characterized the five regional growth concepts; summarized the results of the Public Information Centre/Facilitated Workshop held on September 8, 2008 at the Gellert Centre; summarized the other written submissions received by the Town as of the writing of this report; provided comments and observations on the five regional growth concepts in the context of the seven regional questions and within the broad framework provided by the Town's Strategic Plan. 	
	Among other matters, it is staff's view that the Town should advise the Region that it is supportive of:	
	i) the provision of additional employment lands along the 401 Corridor in both the Towns of Halton Hills and Milton, as set out in all of the growth concepts, as well as the Mansewood Area;	Refer to response earlier in this submission (see Recommendations).
	ii) the potential identification and protection of strategically located employment lands in Halton beyond 2031; and,	Refer to response earlier in this submission (see Recommendations).
	iii) a preference for an expansion to the Georgetown Urban Area to accommodate residential/mixed use development to a population of a magnitude no greater than 20,000 estimated persons, with the appropriate location to be further considered as part of the evaluation of the short list of growth options, to be released later this year by the Region, and with the benefit of additional information pertaining to servicing, agriculture, aggregate resources (shale), and the financial implications of growth.	Refer to response earlier in this submission (see Recommendations).
Town of Milton Report No. PD-070- 08 (First Principles)	RECOMMENDATION: 1. THAT Milton Council endorse the following First Principles, as they relate to the Region of Halton's Sustainable Halton Plan process:	Recommendation #1: Milton's First Principles were taken under advisement through the Sustainable

Source	Submission	Response
August 18, 2008		Halton process by the Sustainable Halton Working Group (comprised of Regional staff, Local Municipal Planning staff, Public Agency staff and the Province) to refine the growth concepts. The Working Group has investigated additional employment lands, the justification and refinement of the natural heritage system, identification of the Milton Education Village as a Special Policy Area, and a financial assessment of the Growth Concepts.
	a) Balanced residential/employment growth based upon a minimum 0.5 employee to resident ratio;	
	b) Broadest range of employment opportunities and consideration for employment opportunities beyond 2031;	The Region recognizes the
	c) Justification and potential refinement of Natura Heritage System (NHS);	See response to Recommendation #2 below.
	d) Extended areas for intensification beyond Buil Boundary including to-be-identified nodes and corridors;	
	e) Increased financial support from Region relating to regional capital projects ;	The fiscal impact study on the preferred growth option will address Regional and Local Municipal impacts and in particular the financial issues raised in this recommendation and Recommendation i).
	f) That the Province of Ontario be requested to file with affected municipalities a provincial infrastructure and financing plan before the adoption of the Sustainable Halton Plan;	
	 g) Continued and respected input into Region of Halton's assessment/evaluation of refined land use concepts; 	
	h) Identification and designation of Milton Education	The Milton Education Village has

Source	SUBMISSION	Response
	Village Area as a Special Policy Area;	been identified on the refined Growth Concept maps.
	 i) Cost of providing lake-based servicing to Halton Hills must be borne by Halton Hills landowners/developers and that Halton Hills development does not impede Milton's ability to manage its growth; and, 	See response to Recommendation e).
	j) That a comprehensive financial impact analysis be completed and presented to Town of Milton Council that incorporates all capital and operating budget impacts at both the regional and the local municipality level and includes options for mitigation of the impacts of growth on the taxpayer.	A high level financial analysis of the impact of transportation and water and wastewater infrastructure associated with the refined Growth Concepts will be conducted and will demonstrate at a high level, the costs of the Growth Concepts to assist in decision making towards the selection of a preferred land use option.
	2. AND THAT the Town Clerk be directed to inform the Region of Halton that the Town of Milton is unable to endorse the Sustainable Halton Growth Management Strategy Evaluation Framework, attached as Appendix 'A' to Report No. PD-070-08, until such time that the background assessment and justification work has been provided with respect to the proposed Natural Heritage System in accordance with Themes 1.1. and 1.2 of the Evaluation Framework;	Recommendation #2: In response to comments received on the Natural Heritage System (NHS), and in consultation with the Sustainable Halton Working Group, the Halton Ecological and Environmental Advisory Committee, and the Halton Agricultural Advisory Committee, the Natural Heritage System has undergone a number of refinements. A report has been prepared that provides an implementation framework for the Natural Heritage System (3.02; Sustainable Halton Natural Heritage System Definition and Implementation). The NHS will be subject to further refinement
	3. AND FURTHER THAT the Region of Halton and Local Municipalities' Joint Submission to the Province of Ontario's Planning Document – "Planning for Employment in the Greater Golden Horseshoe, Background Paper, May 2008", attached as Appendix 'B' to Report No. PD-070-08, be endorsed by Milton Council, in that it supports Milton's First Principles as they relate to the Region of Halton Sustainable Halton Plan process;	through subsequent planning processes ie/ sub-watershed studies, secondary plans.
	4. AND FURTHER THAT Milton Council endorse Schedule 1, attached as Appendix 'C' to Report No. PD-070-08, in that the schedule highlights those areas of potential employment land use within the Town of Milton to the year 2031 that need to be considered in the context of Milton's First Principles, as they relate to the Region of Halton's Sustainable Halton Plan process;	Recommendation #4: Considered through the Sustainable Halton Working Group Please find Appendix 'C' as Attachment #2 to this document.

Source	SUBMISSION	Response
	5. AND FURTHER THAT the Town Clerk be directed to forward Report No. PD-070-08 and its endorsed recommendations, to the Region of Halton, Town of Oakville, City of Burlington, and Town of Halton Hills, Halton School Boards, Conservation Halton and the Niagara Escarpment Commission, local M.P.P.'s and the Ontario Ministry of Energy and Infrastructure with the acknowledgement that the Town of Milton continues to support the Region of Halton's Sustainable Halton Plan (SHP) process, all the while acknowledging that the Town of Milton has endorsed a set of First Principles upon which the Town of Milton will be assessing the SHP's Five Refined Concepts.	
	REPORT	
	<u>Background</u>	
	On July 7, 2008, at a Special Council Meeting, Milton staff presented a discussion of the Region of Halton's Sustainable Halton Plan process. The "Council Workshop" style presentation was in response to the Region of Halton identifying Five Refined (Land Use) Concepts through Regional Report PPW42-08 (Phase II of Sustainable Halton – The Physical Structure Concepts 2021 – 2031 and the Final Evaluation Framework), which was received by Region of Halton Council on Wednesday, June 18, 2008. A copy of Town of Milton staff's July 7th power point presentation may be found on the Town's website at www.milton.ca.	
	The recommendations resulting from that Regional Council meeting are as follows:	
	 THAT Regional Council receive Report No. PPW42- 08 re: "Phase II of Sustainable Halton – The Physical Structure Concepts 2021 – 2031 and the Final Evaluation Framework" and direct that the Evaluation Framework be applied to Phases III and IV of the Sustainable Halton process, as set out in Attachment #1, under separate cover to this report. 	
	2. THAT staff be directed to consult with the Local Municipalities, the Conservation Authorities and the School Boards on the Five Refined Concepts as set out in Attachment #2, under separate cover to Report No. PPW42-08, and that the Local Municipalities and the other interested agencies be requested to provide their comments on the Five Refined Concepts and the seven questions posed under Consultation on the Five Refined Concepts section of this report by September 30,. 2008.	
	THAT staff report back to Regional Council on the results of the consultation in relation to the Five	

Source	SUBMISSION	Response
	Refined Concepts at the October 22, 2008 Planning and Public Works Committee meeting. 4. THAT the Regional Clerk forward a copy of Report No. PPW42-08 to the City of Burlington, the Town of Oakville, the Town of Milton, Town of Halton Hills, members of the Sustainable Halton Inter-Municipal Technical Committee, the Halton District School Board, the Halton Catholic District School Board, the Conservation Authorities and the Region of Peel for their information.	
	The purpose of the Region's Report was to provide Regional Council with an overview of the work done to date in establishing potential new urban growth areas and to receive direction to consult with the Local Municipalities and other interested agencies on Five Refined Concepts. The report contained a discussion on the approach utilized to develop the Nine Initial Concepts, and analysis of the Nine Initial Concepts on a "good planning" basis, and a discussion of how the Five Refined Concepts for potential new urban growth areas were finally developed. The Five Refined Concepts were presented as representing viable alternatives for managing growth, which have been developed for the 2021 – 2031 timeframe and are intended to create a dialogue around "compare and contrast" scenarios and consideration of whether they adequately address concepts/questions inherent to the Sustainable Halton Plan process.	
	The Region's report notes that it is imperative to continue to promote a discussion with Local Municipalities and other interested agencies on the Five Refined Concepts and the complex issues that underlie the exercise of moving towards the establishment of new urban growth areas. In this regard, the Local Municipalities and other interested agencies are asked to consider whether the Five Refined Concepts address questions that are inherent to the Sustainable Halton process; namely, do they capture Halton's Planning Vision; do they promote complete, healthy and sustainable communities; and, do they encourage economic prosperity? Regional staff have requested that responses to these questions and any other comments from Local Municipalities and other interested agencies be provided by September 30, 2008, to provide Regional Council with an update on the results of this local consultation in October 2008.	
	The second purpose of Regional Report PPW42-08 was to seek Regional Council endorsement of the Final Evaluation Framework, although the final recommendation of Regional Council was to only receive the Framework. The Region's report outlines the	

Source	SUBMISSION	Response
	development and refinement of the recommended Final Evaluation Framework and describes how the Framework will be used to evaluate and measure the growth options as part of the Region's conformity exercise with the Places to Growth Plan. The report also highlights how the Framework was developed; how it implements the Region's Planning Vision for healthy, complete and sustainable communities; how these principles have been translated into measurable evaluation criteria; and how an extensive consultation program was undertaken in the development of the Final Evaluation Framework.	
	A copy of the Region of Halton's Sustainable Halton Working Paper #1: Locating New Urban Land, attached as Attachment #2 to the Regional Report PPW42-08, was provided to Milton Council under separate cover prior to the July 7th Council Workshop. The working paper is described as one in a series of studies that guide Halton Region in preparing a new growth management strategy with the focus being on determining potential locations for new urban lands.	
	Halton's Planning Vision is the foundation of the Sustainable Halton Plan with the fundamental underlying principle being the notion of inter-generational equity. Sustainable Halton is based on protecting the natural environment, enhancing economic competitiveness, fostering an equitable society and building complete and healthy communities. Essential to achieving this goal is the Region's objective of landform permanence, which has historically and will continue to be, a fundamental responsibility and directive of Halton Regional Council. It has continuously been noted that the principles of landform permanence, sustainable development and healthy communities are the foundations of Sustainable Halton; these in turn provide real direction for decision-making in relation to where new growth should occur.	
	Phase I of Sustainable Halton culminated in the finalization of twenty-two Technical Background Reports and this activity formed the basis for the "year of the Building Blocks" as detailed in Regional Report PPW162-07. This first phase was deemed essential in identifying the issues and goals of Sustainable Halton and ultimately served as the foundation for strategic planning and for future decision-making. The twenty-two papers laid the groundwork for Sustainable Halton and were essential to informing the process through detailed research and analysis of issues critical to the Region, as it endeavoured to develop its growth strategy. The issues reviewed in detail during this phase included a land supply analysis, demographic change, air quality, human services, and options for a natural heritage system, aggregates and an agricultural countryside vision. As	

Source	SUBMISSION	Response
Source	indicated, these papers helped to define the issues and goals of the Sustainable Halton Plan. With respect to the Natural Heritage System (NHS), in particular, it must be noted that Regional Council endorsed the principles of the enhanced NHS in March of this year by Council resolution. Presently, Regional staff is preparing a discussion paper on the NHS that will be released in September of this year. That paper will describe how the NHS was developed; what options there are (what is fixed vs. what is discretional); and, tools for implementing the NHS. It must be noted that it has clearly been stated by Regional staff that balancing development and other objectives such as those found within the NHS at the secondary plan level is definitely a key to the overall success of the Sustainable Halton Plan. As indicated previously, Phase II of Sustainable Halton results in an Evaluation Framework, which will set the stage for the development of a sustainable and responsible planning policy context for future growth in the Region. It incorporates the work completed as part of Phase I of Sustainable Halton. Although the work completed in Phase I constitutes the "building blocks" of	The Sustainable Halton Natural Heritage System Definition and Implementation report (Report 3.02) prepared by North-South Environmental is now available.
	 Alignment with Halton's Planning Vision; The work completed as part of Phase I which established the foundations for strategic planning; The Themes, Goals and Objectives contained in the Evaluation Framework, and; The selection of a preferred growth option which incorporates the strategies, actions and implementation of this preferred growth option. 	
	The process of developing the Evaluation Framework has provided meaningful opportunities for capturing local perspectives, ideas, and insights in order to ensure – at each stage of its development – that the principles that inform the Evaluation Framework (themes, goals, and objectives) resonate with the community. Phase I of Sustainable Halton identified a series of principles, which formed the basis of the	

Source	SUBMISSION	Response
	Evaluation Framework. These principles were derived from the Sustainable Halton Phase I Reports and incorporated best practices in growth management including Provincial, Regional and Municipal Policy directions and were vetted through various rounds of stakeholder and community consultation.	
	The Evaluation Framework is based on four themes originating from Regional Report PPW76-07 and includes:	
	1. Protect What is Valuable: Permanently protect and manage Halton's natural environment to preserve the Region's unique natural heritage, maintain a healthy environment and allow for the wise use of natural resources. The first theme serves to ensure a rich, diverse, balanced and sustainable landscape.	
	2. Foster Complete, Healthy, and Sustainable Communities: Protect and enhance quality of life, community values and neighbourhood character. This second theme subscribes to the planning principles as espoused in the Growth Plan, including the needs for complete communities, protection of employment lands, recognizing transit as a priority and the need for firm urban boundaries. Intrinsic to this theme is the recognition of the need to be sensitive to local circumstances.	
	3. Ensure Sustainable Infrastructure to Support Growth: Achieving environmental benefits, economic optimization and societal responsibility. The third theme recognizes that achieving the targets and conformity with the Growth Plan requires financial commitments and perhaps, legislative changes, and changes in the Provincial funding program to ensure that the region does not incur a deficit in urban infrastructure (i.e. roads, transit, water and sewer facilities, hospitals, schools and community facilities).	
	4. Promote Health for All: Ensure community development promotes a healthy population and environment. The fourth theme commits to viewing the land use planning process through a health lens that is firmly rooted in healthy communities and sustainability principles.	
	The Evaluation Framework is organized into a hierarchy of themes, goals, and objectives:	
	<u>Themes</u> are broad overarching key directions that structure the Evaluation Framework and are the	

Source	SUBMISSION	Response
	result of the work done in Phase I of the Sustainable Halton process. • Goals provide direction on the desired outcomes of development in Halton. • Objectives provide measurable targets for the development and evaluation of regional growth scenarios.	
	The Evaluation framework will be employed as a tool to evaluate the final short list of growth options. The measures contained in the Evaluation Framework will be used to test each of the short-listed growth options that will be developed from the Five Refined Concepts in order to recommend a preferred growth option.	
	The purpose of releasing the Nine Initial Concepts and the Five Refined Concepts through Regional Report PPW42-08 was to frame and promote discussion and provide a deeper understanding of the complex, inter-related issues that need to be considered when looking at establishing new urban growth areas. Regional Report PPW42-08 indicated that they illustrate general patterns of urban development in the Region which are based on the Nine Initial Concepts, an analysis of the Nine Initial Concepts on a "good planning" basis and the development of the Five Refined Concepts.	
	In accordance with Recommendation #2 of Regional Report PPW42-08, Regional staff will further consult with the Local Municipalities and various agencies on the Five Refined Concepts to continue the dialogue around where growth should be located and the questions posed around whether the Five Refined Concepts address the questions and desired outcomes that are inherent to Sustainable Halton. Once this dialogue is completed, a short list of options will be developed, evaluated and then presented to Regional Council for consideration, following which the public will be asked to comment. It is anticipated that this Report will be presented to Planning and Public Works Committee on October 22, 2008.	Please refer to Report 3.08, Working Paper #2: Concepts for Addressing Halton Region's Land Needs to 2031, by Urban Strategies Inc.
	The short list of options will be developed, based on the results of the consultation with the Local Municipalities and an analysis of how well the options achieve the goals and objectives of the final Sustainable Halton Evaluation Framework. The short list of options will not necessarily select two or three of the Five Refined Concepts, but could be a compilation of the best elements of each of the Five Refined Concepts, as well as additional refinements as provided throughout the public and municipal consultation. The short list of options will include detailed densities along corridors, at nodes and the adjacent areas and will be subject to a Fiscal Impact Study as well as a review of water, waste water and transportation servicing costs for each of the options. This, along with the application of the final Evaluation Framework against the short list of options, will result in a preferred growth	A high level financial analysis of the impact of transportation and water and wastewater infrastructure associated with the refined Growth Concepts will be conducted and will demonstrate at a high level, the costs

Source	SUBMISSION	Response
	option. The preferred growth option will then be subject to a more detailed Fiscal Impact Study which will commence with the release of the preferred growth option in early 2009 by the Region of Halton.	of the Growth Concepts to assist in decision making towards the selection of a preferred land use option.
	Discussion Working Paper #1 of Sustainable Halton recognizes that Halton Region is working towards a new Regional Growth Management Strategy that will provide a long-term plan for the Region to the year 2031. It is stated that the plan will ensure that Halton continues to be a place of high quality living and working for people today and future generations. It is also acknowledged that the Growth Management Strategy will define a framework for future population and employment growth that fosters complete and healthy communities and is compatible with the Region's enhanced natural heritage system, green space and agricultural lands. The strategy will also link long-term land use planning with transportation, water and wastewater infrastructure planning.	
	Of course, the Region of Halton is a great place to live and work, and continues to attract more people and jobs. The Province has set targets that would see the Region's population reach 780,000 people and 390,000 jobs by 2031. Both the public and private sector agree that well-managed growth can strengthen the Region's economic competitiveness, enhance community well-being, while preserving ecological assets. The overall objective of Sustainable Halton therefore is to develop a Growth Management Strategy that promotes a vision for the Region of reducing urban sprawl, ensuring greater protection of farmland, making best use of infrastructure and promoting more healthy, liveable communities.	
	Halton Region in conjunction with its four local municipalities has a strong history of comprehensive growth management. The Halton Urban Structure Plan (HUSP), approved by Regional Council in 1994, is the Region's existing growth strategy. The Region's new Growth Management Strategy will now respond to contemporary issues such as climate change, a growing and aging population, traffic congestion, and housing affordability. It will ensure that the strategy is consistent with the Region's Official Plan, the Provincial Policy Statement, the Growth Plan for the Greater Golden Horseshoe, the Greenbelt Plan and regional transportation strategies, as well as the strategic plans of the four local municipalities. As part of developing Halton's Growth Management Strategy, the study will test the implications of new Provincial policies set out in the Growth Plan for the Greater Golden Horseshoe, which came into effect on June 16, 2006. The study will also provide Regional Council with the information it requires to decide how much and where growth can be accommodated.	

Source	SUBMISSION	Response
	The challenge in bringing forward Halton's Growth Management Strategy is to find the best ways of accommodating growth, while making the most efficient use of land, utilities, transportation and social infrastructure and protecting natural, cultural and heritage assets; all the while balancing the needs of the four local municipalities. Promoting more liveable communities will require a new understanding of how regional growth management can support communities that are transit oriented, pedestrian friendly and well connected to schools, jobs, and services.	
	Halton's Growth Management Strategy will also need to respond to the interrelationship between local level development and regional and global systems. For instance, the location of housing, jobs, services, and shops affects traffic flow and transit needs locally and regionally. Conversely, inter-regional transportation decisions will affect local land use patterns. Pollution of one stream can affect the ecological health of an entire watershed. Air pollution generated by major transportation infrastructure can affect the health of people living around it; and at the same time, the efficiency of moving people and goods has an impact on local, regional and national economies.	
	Regional Report PPW42-08, with its Working Paper #1: Locating New Urban Land, and its associated Evaluation Framework marks a big step in developing Halton's Growth Management Strategy and addressing the challenge of where growth should go. As noted, one of the primary challenges is to address the local municipalities concerns, all the while achieving a balance of residential and employment greenfield growth, along with an equitable infill/intensification distribution to ensure an approach to growth management that reflects the values of the people of Halton.	
	In the case of Milton, the Town has the experience of having to accommodate unprecedented growth over the past eight years, since the approval of HUSP and introduction of lakebased servicing. The general reaction to the major growth has mostly been of a positive nature and the belief is that Milton has managed quite well from a physical land use and financial viability perspective. However, with the release of the Five Refined Concepts, it is obvious that the growth and financial management pressures that the Town has experienced and will experience until 2021 will also continue within the 2021 to 2031 period.	
	What has become obvious through the Sustainable Halton Plan process is that the local municipalities must be given the opportunity through the selected land use concept to balance its growth. For the Town of Milton, the major concern is the	

Source	Submission	Response
	balance between residential and employment growth, between greenfield and infill/intensification growth, and between developable land and non-developable land, which is normally included within the extended Natural Heritage System.	
	This leads to the major concern that has been expressed by the Town of Milton from the outset of the Sustainable Halton Plan process. Milton has been successful in moving forward with growth because it has maintained a healthy employee to resident ratio, well above a 0.5 to 1 ratio. Unfortunately, the Five Refined Concepts presented by the Region of Halton do not maintain this important ratio and from Milton's economic development perspective, this principle of balance is imperative.	Achieving an activity rate for each of the Local Municipalities that reflects balanced, sustainable communities was a key consideration when refining the Growth Concepts through the Sustainable Halton Working Group.
	From another perspective, Milton realistically looks to achieve that delicate balance of environmental integrity with developability. Unfortunately, the Evaluation Framework, attached as Appendix 'A' to Report No. PD-070-08, through its elaboration of Theme #1 – Protecting What is Valuable, highlights the important theme of "identifying and protecting centres of regional diversity of sufficient area to allow for permanent protection of regional diversity but has not provided the necessary background justification as to why certain strategic areas of developability within Milton (i.e. the Trafalgar Road/Britannia Road node) have been identified as "discretionary centres of biodiversity". It is for this reason that Milton staff must recommend that Milton Council not endorse the Evaluation Framework at this time.	The centre for biodiversity has been reviewed by North-South Environmental and relocated based on feedback received. The Region has responded to landowner concerns by developing the <i>Natural Heritage System Definition and Implementation Report (Report 3.02)</i> in consultation with the Sustainable Halton Working Group and the Ecological and Environmental Advisory Committee.
	Instead, in order to acknowledge that the Town of Milton supports the Sustainable Halton Plan process, all the while acknowledging that Milton has a number of outstanding issues that need to be addressed, Milton staff have developed a set of First Principles of Growth that needs to be addressed prior to Milton being able to support the identification of a preferred SHP land use concept. These First Principles speak to Milton's acceptance of continued growth beyond 2021 but speaks to Milton's need to balance growth and to physically manage the required infrastructure and to financially manage the growth.	
	It is Milton's hope and desire that these principles will be respected and applied during the Region's refinement of the SHP Concepts. Milton has made the commitment to work with the Region and its Local Area Municipalities and it is Milton's desire that the Region and all four Local Municipalities will be able to collectively support the preferred land use concept that will have evolved from a transparent, all encompassing, reasonable and comprehensive process and are committed to be part of this process.	Comment duly noted by Regional staff. The Region worked closely with the Local Municipalities to create the refined Growth Concepts through the Sustainable Halton Working Group.
	In this manner, Milton staff will continue to be as involved in	

Source	SUBMISSION	Response
	the SHP process as much as possible and will work with the Region and Local Area Municipalities to continue discussions with the Province, whereby the issue of the balancing of local, regional and provincial requirements is resolved to everyone's satisfaction. Milton staff consider the highlighted recommendations of Report No. PD-070-08 to represent an opportunity to move forward in a comprehensive and collective manner, all the while assuring that the Town of Milton's Strategic Plan, Goals and Objectives are met.	
	Conclusions	
	In summary, although the Town of Milton supports the Region of Halton's Sustainable Halton Plan process to the fullest extent possible, at this time there are several areas of concern that have been articulated during Milton Council's Workshop that was held on July 7, 2008. These concerns have previously been articulated to an extensive degree and have resulted in Milton identifying a set of First Principles for Growth, which are highlighted through the recommendations of Report N. PD-070-08 in order to allow the Town of Milton to control its own destiny.	
	As such, Milton staff consider there to be four major issues that are outstanding and, therefore, must be resolved prior to the further refinement of the Five Refined Concepts. These outstanding issues are:	
	a) Range and Extent of Employment Lands – The Town of Milton strongly believes that there is an absolute need to expand the range and extent of available employment lands within both the local Municipalities and the Region of Halton as a whole. As indicated within the July 2008 Region of Halton and Local Area Municipalities Joint Submission to the Province of Ontario's Planning Document – "Planning for Employment in the Greater Golden Horseshoe Background Paper, maybe 2008", the Region of Halton has already taken a strong position to make available the wider range of employment opportunities possible within the Region of Halton in order to increase its economic development potential and competitiveness. It is for this reason that Milton staff is recommending the endorsement of the Joint Submission, as attached as Appendix 'B' to the Report No. PD-070-08 and also recommending the formal identification of areas of employment land uses within the Town of Milton and are asking that the Region of Halton give serious consideration to the inclusion of all development lands within a preferred SHP land use concept.	Through regular meetings of the Sustainable Halton Working Group (comprised of Regional and Local Municipal planning staff, Public Agencies, and the Province), discussions have taken place regarding the potential designation of additional employment lands to 2031. Recent work completed by Hemson Consulting Ltd. concluded that based on additional information (which included previously unavailable 2006 Census data), there is a need for approximately 1,100 ha of employment.
	b) Natural Heritage System – Milton staff are concerned that appropriate justification has not been	The Region has responded to landowner concerns by developing

Source	SUBMISSION	Response
	provided with respect to the "discretionary centres for biodiversity" that have been identified as essential components of the Natural Heritage System, which provides the "environmental framework" to the Five Refined Concepts. As a result, Milton staff cannot at this time recommend that Milton Council endorse the Sustainable Halton Growth Management Strategy – Evaluation Framework, as attached as Appendix 'A' to Report No. PD-070-08.	the Natural Heritage System Definition and Implementation Report (Report 3.02) in consultation with the Sustainable Halton Working Group and the Ecological and Environmental Advisory Committee. The recommendation regarding the regional centre of biodiversity has been reviewed and has been implemented in the refined growth concepts.
	c) Financial Viability – A key First Principle that is necessary in order to maintain and enhance Milton's ability to control and manage the future growth, that is reflected through any of the Region's Five Refined Concepts, involves the increased participation by both the Region of Halton and Province of Ontario from a financial viability perspective,. It is therefore essential that, before a preferred land use concept is approved, a comprehensive financial impact study is completed that incorporates capital and operating expenditures and revenues and resulting tax rate impact.	A high level financial analysis of the impact of transportation and water and wastewater infrastructure associated with the refined Growth Concepts will be conducted and will demonstrate at a high level, the costs of the Growth Concepts to assist in decision making towards the selection of a preferred land use option.
	d) Intensification – The outstanding issue of infill/intensification is important in that it is an essential element to the Region of Halton's SHP growth management strategy, as well as being an essential element of the Province's Places to Grow Plan. To date, all of the Five Refined Concepts are based on a 60 percent Greenfield and 40 percent intensification split, even though all four local Municipalities have concerns with respect to the intensification target. To date, the Region of Halton's Land Supply Analysis Technical Background report identified that between 2021 and 2031, 81,000 new households are required. When multiplied by a 40 percent intensification factor, this equates to 32, 400 intensification households, with the remaining 48,600 households being greenfield households. Although the physical areas and the projected number of units and population that can be accommodated for intensification will be provided to the Region by the Local Municipalities in addition to the Greenfield lands needed, Milton staff are concerned that 32, 400 intensification households is a far greater number than can physically be accommodated within the four local municipalities.	The Region has adopted a "bottom-up" approach with respect to achieving the intensification targets established in Places to Grow. The Region has received the municipalities' estimated number of residential intensification units to 2031 and has ensured that these numbers were incorporated into the intensification work. Hemson Consulting Ltd. has prepared a technical report detailing the updates to the land supply analysis in Report 3.07: Sustainable Halton: Accommodating Growth to 2031.
	Relationship to the Strategic Plan	
	Report No. PD-070-08 and its recommendations relate to the	

Source	SUBMISSION	Response
	Town of Milton's Strategic Plan (Destiny Milton 2: Shaping our Future) goals and objectives, specifically:	
	GOAL - A responsible cost effective and accountable local government	
	 Participate fully in Region led exercises that are intended to maintain and enhance quality of life. Ensure that Milton's interests and needs are known at the Regional level. 	
	GOAL – Well-managed growth, well planned spaces	
	 Encourage the provision of healthy supply of employment and commercial lands to serve local needs at all times. 	
	 Encourage the siting of employment areas in locations that are easily accessed by 400 series highways. 	
	 Ensure that the Town demonstrates leadership in any future urban expansion to ensure that new development is as cost effective as possible. 	
	GOAL – A diverse and sustainable economy	
	 Encourage the development of regional-scale retail uses in appropriate locations to ensure that all consumer needs can be met in the Town. Work with other levels of government to encourage additional investment in Milton. 	
	GOAL – A thriving natural environment that is a valued community asset to be protected, maintained and enjoyed.	
	 Encourage the decision-making process to be supported by an understanding of the natural environment including values, opportunities, limits and constraints. 	
	<u>Financial Impact</u>	
	Report No. PD-070-08 has no direct financial impact on the Town of Milton. However, if the First Principles that the Town of Milton endorses with respect to the Region of Halton's Sustainable Halton Plan process are not respected, specifically during the identification of a preferred Land Use Concept, then the outcome may very well have a negative financial impact on the Town of Milton's ability to manage the anticipated future growth within Milton from 2021 to 2031.	

Source	SUBMISSION	Response
Town of Milton Report No. PD-076- 08 (Response to Five Refined Growth Concepts) September 22 2008	Report to: Mayor G. A. Krantz and Members of Council From: E. Iovio, M.C.I.P., R.P.P., Director of Planning & Development Date: September 22, 2008 Report No. PD-076-08 Subject: Region of Halton Sustainable Halton Plan (SHP) Town of Milton's Response to Five Refined Growth Concepts RECOMMENDATION: 1. THAT the Town of Milton endorse Appendix A to Report PD-076-08 save and except Area "D" to remain as employment as designated in the current official plan as the Town of Milton's Sustainable Halton Plan Preferred Land Use Concept, in accordance with Milton's First Principles of Growth, which were previously endorsed by Milton Council through Report No. PD-070-08 on August 18, 2008, with the specific acknowledgment that the Town of Milton has no objection to the Town of Halton Hills' receiving a portion of the required greenfield residential development, subject to the cost of providing lake-based servicing to Halton Hills being borne entirely by the affected Halton Hills landowners/developers and that any proposed Halton Hills development does not impede Milton's ability to manage its own future growth in accordance with established HUSP principles; 2. AND THAT the Town Clerk be directed to forward Report No. PD-076-08 and its endorsed recommendations, to the Region of Halton, Town of Oakville, City of Burlington and Town of Halton Hills, Halton School Boards, Conservation Halton and the Niagara Escarpment Commission, local M.P.P.s and the Ontario Ministry of Energy and Infrastructure; 3. AND FURTHER THAT the Town Clerk be directed to reinforce to the Region of Halton's Director of Planning that the Town of Milton continues to be unable to endorse the Sustainable Halton Growth Management Strategy Evaluation Framework until such time that the Natural Heritage System (NHS) justification work has been provided to the Town of Milton for its review and comment.	Recommendation #1: The Town of Milton's Sustainable Halton Plan Preferred Land Use Concept was taken under advisement through the Sustainable Halton process and by the Sustainable Halton Working Group (comprised of Regional staff, Local Municipal Planning staff, Public Agencies and the Province) in refining the Growth Concepts. The fiscal impact analysis on the preferred growth option will address Regional and Local Municipal impacts and in particular the financial issues raised here. Recommendation #3: In response to comments received on the Natural Heritage System (NHS), and in consultation with the Sustainable Halton Working Group, the Halton Ecological and Environmental Advisory Committee, and the Halton Agricultural Advisory Committee, and the Halton Agricultural Advisory Committee, the Natural Heritage System has undergone a number of refinements. A report has been prepared that provides an implementation framework for the Natural Heritage System.

Source	SUBMISSION	Response
	EVECUTIVE CUMMARY	
	On July 7, 2008, at a Special Council Meeting, Milton staff presented a discussion of the Region of Halton's Sustainable Halton Plan process. The "Council Workshop" style presentation was in response to the Region of Halton identifying Five Refined (Land Use) Concepts through Regional Report PPW42-08 (Phase II of Sustainable Halton – The Physical Structure Concepts 2021 – 2031 and the Final Evaluation Framework), which was received by Region of Halton Council on Wednesday, June 18, 2008. A copy of Town of Milton staff's July 7 th power point presentation may be found on the Town's website at www.milton.ca . Subsequent to the July 7 th Special Council Meeting, Milton staff formalized Council's direction through Report No. PD-070-08, during its August 8, 2008 Council Meeting. The result was that a set of First Principles of Growth were endorsed, which were to provide the framework to the Town of Milton's response to the Five Refined Concepts presently circulated by	
	the Region of Halton for comment. A copy of Town of Milton Report No. PD-070-08 is also available through the Town's website. Milton's response is intended to be provided through Report No. PD-076-08 by way of a Preferred Land Use Concept, which has been developed by staff in consultation with both the public and private sector and in accordance with Milton's First Principles of Growth.	
	Milton staff strongly believes that once the various Refined Concepts are distilled and further refined concepts/ options are evaluated in accordance with the to-be-approved Region of Halton Final Evaluation Framework, then the preferred concept will be centred on Milton. As such, Milton staff believes that the most effective and responsible manner in which the projected growth can be both physically and fiscally managed is to acknowledge the local, regional and provincial policies on those lands that are directly adjacent to the Mississauga, Oakville, Burlington and Milton Urban Areas, which are located primarily within the Town of Milton boundaries.	In developing the Growth Concepts, the Region has acknowledged the policies and land uses of adjacent lands.
	An acknowledgement of this nature by the Town of Milton is obviously subject to the First Principles of Growth already endorsed by Milton Council and is not exclusive of Halton Hills receiving a portion of residential or employment growth. However, the Town of Milton cannot support growth extending north of the Highway 401 Corridor until such time that the Region of Halton has demonstrated through an extensive	A high level financial analysis of the impact of transportation and water and wastewater infrastructure associated with the refined Growth Concepts will be conducted and will

Source	Submission	Response
	financial analysis that growth within the Town of Halton Hills will not have an adverse or negative financial impact on the Town of Milton; and, will not impede in any manner Milton's ability to continue to manage the lake-based growth that resulted from the Halton Urban Structure Plan.	demonstrate at a high level, the costs of the Growth Concepts to assist in decision making towards the selection of a preferred land use option. [A]
	REPORT	
	<u>Background</u>	
	The June 18, 2008, recommendations that resulted from Region of Halton Council's consideration of Regional Report No. PPW42-08, as they pertain to Sustainable Halton Plan process, are as follows:	
	 THAT Regional Council receive Report No. PPW42-08 re: "Phase II of Sustainable Halton – The Physical Structure Concepts 2021 – 2031 and the Final Evaluation Framework" and direct that the Evaluation Framework be applied to Phases III and IV of the Sustainable Halton process, as set out in Attachment #1, under separate cover to this report. 	
	2. THAT staff be directed to consult with the Local Municipalities, the Conservation Authorities and the School Boards on the Five Refined Concepts as set out in Attachment #2, under separate cover to Report No. PPW42-08; and that the Local Municipalities and the other interested agencies be requested to provide their comments on the Five Refined Concepts and the seven questions posed under Consultation on the Five Refined concepts section of this report by September 30, 2008.	
	 THAT staff report back to Regional Council on the results of the consultation in relation to the Five Refined Concepts at the October 22, 2008 Planning and Public Works Committee meeting. 	
	4. THAT the Regional Clerk forward a copy of Report No. PPW42-08 to the City of Burlington, the Town of Oakville, the Town of Milton, Town of Halton Hills, members of the Sustainable Halton Inter-Municipal Technical Committee, the Halton District School Board, the Halton Catholic District School Board, the Conservation Authorities and the Region of Peel for their information.	
	The purpose of the Report PPW42-08 was to provide Regional Council with an overview of the work done to date in establishing potential new urban growth areas and to receive direction to consult with the Local Municipalities and other interested agencies on Five Refined Concepts. The report contained a discussion on the approach utilized to develop the Nine Initial concepts, an analysis of the Nine Initial Concepts	

Source	SUBMISSION	Response
COSNOL	on a "good planning" basis, and a discussion of how the Five Refined Concepts for potential new urban growth areas were finally developed. The Five Refined Concepts were presented as representing viable alternatives for managing growth, which have been developed for the 2021 – 2031 timeframe and are intended to create a dialogue around "compare and contrast" scenarios and consideration of whether they adequately address concepts/questions inherent to the Sustainable Halton Plan process.	TALOI ONOL
	The stated purpose of releasing the Nine Initial Concepts and the Five Refined Concepts through Regional Report PPW42-08 was to frame and promote discussion and provide a deeper understanding of the complex, inter-related issues that need to be considered when looking at establishing new urban growth areas. Regional Report PPW42-08 indicated that they illustrate general patterns of urban development in the Region which are based on the Nine Initial concepts, an analysis of the Nine Initial concepts on a "good planning" basis and the development of the Five Refined Concepts,.	
	In accordance with Recommendation #2 of Regional Report PPW42-08, Regional staff are currently consulting with the Local Municipalities and various agencies on the Five Refined concepts to continue the dialogue around where growth should be located and the questions posed around whether the Five Refined concepts address the questions and desired outcomes that are inherent to Sustainable Halton. On September 9th, the Region of Halton held a SHP workshop at the Milton Sports Centre where approximately 75 people attended, and similar meetings were held in the other Local Area Municipalities. Once this dialogue is completed, a short list of options will be developed, evaluated and then presented to Regional Council for consideration, following which the public will be asked to comment.	
	The short list of options will be developed, based on the results of the consultation with the Local Municipalities and an analysis of how well the options achieve the goals and objectives of the final Sustainable Halton Evaluation Framework. It has been noted that the short list of options will not necessarily select two or three of the Five Refined Concepts, but could be a compilation of the best elements of each of the Five Refined Concepts, as well as additional refinements as provided throughout the public and municipal consultation. The short list of options will include detailed densities along corridors, at nodes and the adjacent areas and will be subject to a Fiscal Impact Study as well as a review of water, waste water and transportation servicing costs for each of the options. This, along with the application of the final Evaluation Framework against the short list of options, will result in a preferred growth option. The preferred growth option will then be subject to a more detailed Fiscal Impact Study which will commence with the release of the preferred	See previous response on fiscal analysis.

Source	Submission	Response
	growth option in early 2009 by the Region of Halton.	
	In response to the invitation by the Region of Halton for local municipal comment, the Town of Milton has considered the issue of growth within Milton between 2021 and 2031 during its last two Council Meetings. On July 7, 2008 preliminary reaction and discussion occurred during a presentation of the Five Refined Concepts by Town staff. This resulted, on August 18th, with Council endorsing a series of recommendations through Staff Report No. PD-070-08, which established the basis upon which the Town of Milton would assess and respond to the Five Refined Concepts. The endorsed recommendations of Report No. PD-070-08 are as follows:	See responses to Report No. PD-070-08, starting on page. 30.
	THAT Milton Council endorse the following First Principles, as they relate to the Region of Halton's Sustainable Halton Plan process:	
	(a) Balanced residential/employment growth based upon a minimum 0.5 employee to	
	resident ratio; (b) Broadest range of employment opportunities and consideration for	
	employment opportunities beyond 2031; (c) Justification and potential refinement of Natural Heritage System (NHS);	
	(d) Extended areas for intensification beyond Built Boundary including to-be-identified nodes and corridors;	
	(e) Increased financial support from Region relating to Regional capital projects;	
	(f) That the Province of Ontario be requested to file with affected municipalities a provincial infrastructure and financing plan before the adoption of the Sustainable Halton Plan;	
	(g) Continued and respected input into Region of Halton's assessment/evaluation of refined land use concepts;	
	(h) Identification and designation of Milton Education Village Area as a Special Policy	
	Area; (i) Cost of providing lake-based servicing to Halton Hills must be borne by Halton Hills landowners/developers and that Halton Hills development does not impeded Milton's ability to manage its growth; and,	
	(j) THAT a comprehensive financial impact analysis be completed and presented to Town of Milton Council that incorporates all capital and operating budget impacts at both the regional and the local municipality	

Source	SUBMISSION	Response
	level and includes options for mitigation of the impacts of growth on the taxpayer.	
	AND THAT the Town Clerk be directed to inform the Region of Halton that the Town of Milton is unable to endorse the Sustainable Halton Growth Management Strategy Evaluation Framework, attached as Appendix 'A' to Report No. PD-070-08, until such time that the background assessment and justification work has been provided with respect to the proposed Natural Heritage System in accordance with Themes 1.1 and 1.2 of the Evaluation Framework;	
	AND FURTHER THAT the Region of Halton and Local Municipalities' Joint Submission to the Province of Ontario's Planning Document – "Planning for Employment in the Greater Golden Horseshoe, Background Paper, May 2008", attached as Appendix 'B' to Report No. PD-070-08, be endorsed by Milton Council, in that it supports Milton's First Principles as they relate to the Region of Halton Sustainable Halton Plan process;	
	AND FURTHER THAT Milton Council endorse Schedule 1, attached as Appendix 'C' to Report No. PD-070-08, in that the schedule highlights those areas of potential employment land use within the Town of Milton to the year 2031 that need to be considered in the context of Milton's First Principles, as they relate to the Region of Halton's Sustainable Halton Plan process;	
	AND FURTHER THAT the Town Clerk be directed to forward Report No. PD-070-08 and its endorsed recommendations, to the Region of Halton, Town of Oakville, City of Burlington, and Town of Halton Hills, Halton School Boards, Conservation Halton and the Niagara Escarpment Commission, local M.P.P.s and the Ontario Ministry of Energy and Infrastructure with the acknowledgement that the Town of Milton continues to support the Region of Halton's Sustainable Halton Plan (SHP) process, all the while acknowledging that the Town of Milton has endorsed a set of First Principles upon which the Town of Milton will be assessing the SHP's Five Refined Concepts.	
	Report No. PD-070-08 also identified four major issues that are outstanding with respect to the current stage of the Sustainable Halton Plan process and concludes that these issues must be resolved prior to the further refinement of the Five Refined Concepts.	
	These outstanding issues continue to be:	

Source	SUBMISSION	Response
	(a) Range and Extent of Employment Lands – The Town of Milton strongly believes that there is an absolute need to expand the range and extent of available employment lands within both the Local Municipalities and the Region of Halton as a whole. As indicated within the July 2008 Region of Halton and Local Area Municipalities Joint Submission to the Province of Ontario's Planning Document – "Planning for Employment in the Greater Golden Horseshoe Background Paper, May 2008", the Region of Halton has already taken a strong position to make available the wider range of employment opportunities possible within the Region of Halton in order to increase its economic development potential and competitiveness. It is for this reason that Milton staff recommended the endorsement of the Joint Submission, as attached as Appendix 'B' to Report No. PD-070-08, and also recommended that the extended designation of areas of employment land uses within the Town of Milton and have also asked that the Region of Halton give serious consideration to the inclusion of all development lands within a preferred SHP land use concept.	Through regular meetings of the Sustainable Halton Working Group (comprised of Regional and Local Municipal planning staff, Public Agencies, and the Province), discussions have taken place regarding the potential designation of additional employment lands to 2031. Recent work completed by Hemson Consulting Ltd. concluded that based on additional information (which included previously unavailable 2006 Census data), there is a need for approximately 1,100 ha of employment.
	(b) Natural Heritage System – Milton staff are also concerned that appropriate justification has not yet been provided with respect to the "discretionary centres for biological diversity" that have been identified as essential components of the Natural Heritage System, which provides the "environmental framework" to the Five Refined Concepts. As a result, Milton staff still cannot at this time recommend that Milton Council endorse the Sustainable Halton Growth Management Strategy – Evaluation Framework, as attached as Appendix 'A' to Report No. PD-070-08.	The Region has responded to landowner concerns by developing the <i>Natural Heritage System Definition and Implementation Report (Report 3.02)</i> in consultation with the Sustainable Halton Working Group and the Ecological and Environmental Advisory Committee. The recommendation regarding the regional centre of biodiversity has been implemented in the refined growth concepts.
	(c) Financial Viability – A key First Principle that is necessary in order to maintain and enhance Milton's ability to control and manage the future growth, which is reflected through any of the Region's Five Refined Concepts, involves the increased participation by both the Region of Halton and Province of Ontario from a financial viability perspective. It is therefore essential that, before a preferred land use concept is approved, a comprehensive financial impact study is completed that incorporates capital and operating expenditures and revenues and the resulting tax rate impact on both the Region of Halton and Local Area Municipalities.	See previous response. [A]
	(d) Intensification – The outstanding issue of infill/intensification continues to be important in that it	The Region has adopted a "bottom- up" approach with respect to

Source	SUBMISSION	Response
Source	is an essential element to the Region of Halton's SHP Growth Management Strategy, as well as being an essential element of the Province's Places to Grow Plan. To date, all of the Five Refined Concepts are based on a 60 percent greenfield, and 40 percent intensification split, even though all four Local Area Municipalities have concerns with respect to the intensification target. To date, the Region of Halton's Land Supply Analysis Technical Background report identified that between 2021 and 2031, 81,000 new households are required. When multiplied by a 40 percent intensification factor, this equates to 32,400 intensification households, with the remaining 48,600 households being greenfield households. Although the physical areas and the projected number of units and population that can be accommodated for intensification will be provided to the Region by the Local Area Municipalities in addition to the greenfield lands needed, Milton staff remains concerned that 32,400 intensification households is a far greater number than can physically be accommodated within the four Local Area Municipalities. Discussion As part of the Sustainable Halton September PIC held in Milton on September 9, 2008, a SHP workbook was distributed. Within that workbook, the Region of Halton states that when planning for new urban areas, Halton Region's decisions are based on the following principles: Protecting farmland; Protecting and enhancing natural features – streams, creeks, forests, valleys; More liveable communities, Reducing sprawl, Making better use of infrastructure. The workbook also notes that the Five Refined Growth Concepts currently being considered through the Sustainable Halton Plan process reflect Halton's planning vision and the priorities identified through previous work and technical studies and that a number of common themes are found within each Growth Concept. These themes are as stated: A natural heritage system that includes features like woodlots, valleys, streams, creeks; New mixed-uses fresidential lan	achieving the intensification targets established in Places to Grow. The Region has received the municipalities' estimated number of residential intensification units to 2031 and has ensured that these numbers were incorporated into the intensification work. Hemson Consulting Ltd. has prepared a technical report detailing the updates to the land supply analysis entitled; Sustainable Halton: Accommodating Growth to 2031(Report 3.07).

Source	SUBMISSION	Response
	 Keeping farmland in the southern portion of Halton Hills to support established farming activities in the area; Keeping southwest Milton as rural to preserve connections with farmland in the Greenbelt and Niagara Escarpment area and to limit the potential for land use conflicts with the Halton Waste Management Facility and the CN rail corridor; The opportunity to locate mixed-use/residential development around the potential GO Transit Station in east Milton in order to support and encourage transit use; and New employment lands are located along the Highway 401 in both Milton and Halton Hills because this location is a preferred trucking route with good highway access and has strong connections to existing employment areas. 	
	For the most part, Milton staff can support the principles and common themes as presented and have prepared a Preferred Land Use Concept for Milton Council's consideration and endorsement, which staff believe best represents and interprets Milton's First Principles of Growth. The Town of Milton – SHP Preferred Land Use Concept, attached as Appendix A to Report No. PD-076-08, maximizes a balanced residential/employment growth in Milton, all the while providing for the protection of farmland, the protection and enhancement of natural features, more liveable communities, reduced sprawl and a better use of infrastructure, within the Region of Halton.	Comments noted. Working with the revised mixed-use/residential and employment land needs as determined through further land supply analysis by Hemson Consulting Ltd., the Region has worked closely with the Local Municipalities (through the Sustainable Halton Working Group), to refine the Growth Concepts.
	The Town of Milton – SHP Preferred Land Use Concept, as provided for through Report No. PD-076-08, adds an initial growth phase of approximately 3600 hectares of urban land to Halton Region, of which approximately 1,200 hectares are for employment use, 2173 hectares are for residential/mixed uses, and 227 hectares have been identified as a Major Mixed-Use/Retail Transit Node. It must be noted that within the Town of Milton – SHP Preferred Land Use Concept, all calculated areas do not include the lands identified as the Natural Heritage System, which occupies approximately 1300 hectares, as well as the Parkway Belt Lands. The Preferred Land Use Concept also identifies 1,089 hectares of land contained within what has come to be known as the CN Planning District which Milton staff believe should be considered as a Special Study Area in its entirety but with a phase 1 development of approximately 150 hectares, given the importance of these specific lands in relation to the	The land supply analysis has been updated by Hemson Consulting Ltd. The revised land need requirements for Sustainable Halton are 1,680 hectares of mixed-use/residential, and 1,100 hectares of employment, below the level of development proposed in the Town of Milton – SHP Preferred Land Use Concept. Of the 1,100 hectares identified for employment, approximately 200 hectares is located along Tremaine Road in south Milton, adjacent to the rail line.
	Provincial and Federal initiatives relating to goods movement. Milton staff also believes that the 160 hectare Special Policy Area, which is targeted for the Milton Education Village, must be considered as a separate land use entity, outside of the employment or residential growth areas, in that it also provides a land use function beyond the context of the Local Area	The Milton Education Village has been identified on the refined Growth Concepts. These lands will be required within the Sustainable Halton planning horizon (2006-2031)

Source	SUBMISSION	Response
	Municipalities and Region of Halton. The identification of the Milton Education Village as a Special Policy Area is also supported by the Town's intent to promote the readiness of the area through a comprehensive land use plan that includes a research park for new technologies component, which directly relates to the proposed university programming.	and therefore are proposed to be included within the Milton urban area. However, provincial/national education uses are not included in municipal demand forecast and therefore, these lands have not been counted as part of the Region's land needs analysis.
	In accordance with Appendix A, the specific area breakdown and justification for its consideration within the Preferred Land Use Concept is as follows: Area A - Highway 401 Employment - 700 acres (279 hectares)	Please refer to Report 3.08, Working Paper #2: Concepts for Addressing Halton Region's Land Needs to 2031 for maps and descriptions of the refined Growth Concepts.
	Area A is a potential employment area located south of Highway 401 to Derry Road, extending from the Parkway Belt West lands, which are located along the City of Mississauga boundary to the east branch of the 16-mile Creek to the west. This area has the highest importance among all employment lands within the Town of Milton – SHP Preferred Land Use Concept, as the lands front onto both Highway 401 and Derry Road and are centred on the CPR railway line and proposed GO Transit Station. Given their high profile location, these lands are contemplated for prime office, research and development, office/manufacturing and logistic opportunities.	The refined Growth Concepts include employment along the Highway 401 corridor in Milton, and along the Highway 407 corridor in east Milton.
	Area B – Highway 407 Employment – 764 acres (309 hectares)	Circum the land woods identified
	Area B consists of potential employment lands that front onto Highway 407. Industrial/warehousing and related uses, as well as low-rise office campuses, are envisioned within this area, in order to take advantage of the direct exposure to Highway 407 and relative access to the same. Employment Areas A and B also provide a type of distinctive buffer and separation to the City of Mississauga/Ninth Line Corridor and North Oakville. In the latter case, the potential employment uses compliment the designated employment area located just to the south of Highway 407 within the approved North Oakville Secondary Plan Area.	Given the land needs identified through the land supply analysis and given discussions with the Sustainable Halton Working Group, other areas within the Region have been identified as a higher priority for employment to 2031. The Region also recognizes the importance of protecting strategic employment lands beyond 2031 and will be providing protection through the Region's statutory five year Official Plan Review process.
	Area C – Elimination of "Discretionary Centre of Biological Diversity" from the Natural Heritage System and conversion to Potential Mixed Use/Residential 450 acres (182 hectares)	
	In keeping with one of the Region of Halton's overriding principles, in conjunction with the Town of Milton's First Principles for Growth, Milton staff believe that the placement of a "discretionary centre for biological diversity" is inappropriate within Area C and, given that Trafalgar Road is identified as a major infrastructure and transportation corridor, that Area C must be considered instead as a potential Mixed-	The centre for biodiversity has been reviewed by North-South Environmental and relocated based on feedback received, given the important role of Trafalgar Road from an urban structure perspective.

Source	SUBMISSION	Response
	Use/Residential Area. The addition of Area C also provides the acreage necessary to define the potential Mixed-Use/Residential Planning District east of the East Branch of the Sixteen Mile Creek. In terms of the suggested elimination of the "discretionary centre for biological diversity" along	
	Trafalgar Road, Milton staff believe that a more appropriate addition to the Natural Heritage System would be those environment lands which encompass the Rattlesnake Point Golf Course, excepting a small portion of lands that front onto Regional Road 25, which are appropriate for hotel, tourism, time-shared condominium residences. As well, Milton staff believes that the very southeast corner of Milton should also be considered in lieu of the elimination of Area C from the Natural heritage System. These areas are identified as Area G on the Town of Milton – SHP Preferred Land Use Concept.	
	Area D- Employment Area South/East of Derry and James Snow Parkway- 437 acres (177 ha)	
	This area is currently designated employment in the Town's official plan. This is the preferred land use. However, through further analysis and refinement in the Sustainable Halton process, if it can be demonstrated that an equal or greater amount of new, serviced employment land can be made available for development, in a timeframe and location that is satisfactory to the Town, the area may be considered for Mixed Use/Residential land use.	The refined Growth Concepts have retained this area as employment.
	Area E – James Snow Parkway Employment – 302 acres (122 hectares)	
	As noted above, Area E is appropriately positioned as potential employment land in that it is perfectly located adjacent to the James Snow Parkway frontage and is a natural extension of the existing Highway 401 Industrial Business Park.	The refined Growth Concepts have shown this area for proposed employment.
	<u>Area F - CN Planning District Employment Area - 600 acres</u> (250 hectares), Special Study Area - 2,090 acres (845 hectares)	
	The CN Planning District, as it has come to be known, has been identified for potential employment uses which have been the subject of considerable debate for the past five years since CN first announced their intention to develop some 1,200 acres as an intermodal and related industrial site. Since that time, CN has indicated that due to efficiencies gained at other locations, the intent to develop the intermodal component of the site is no longer a priority. Given this commitment, the identification of a small portion (250 hectares) of the total planning district for potential employment uses at this time supports local, provincial and federal policies relating to goods movement taking advantage of the rail spur access to the main north/south rail line. As the construction of	The refined Growth Concepts illustrate approximately 200 ha of proposed employment land in this area.

Source	SUBMISSION	Response
	the newly-aligned Tremaine Road between Highway 407 and Highway 401 is critical for the increased development on the west side of Urban Milton, including the proposed Milton Education Village, staff are advocating that a first phase, which is centred on Tremaine Road, be designated through the Sustainable Halton Plan and that the remaining lands also be considered through a Special Study Area designation, in order to examine more fully the range and extent of employment uses that could be accommodated from an economic development perspective, in light of Milton's desire to capture the fullest range and extent of employment opportunities possible.	Comments noted.
	Area G – Extension to Natural Heritage System 750 acres (300 hectares) As noted earlier, Milton staff is of the opinion that the two additional areas identified as Area G are more appropriately suited to be included within the overall Natural Heritage System and, therefore, are requesting that Areas G be examined during the refinement and justification of the Natural Heritage System by the Region of Halton's Environmental Consultants. Area H – Potential Major Mixed Use Retail Transit Node – 560	See previous responses on the Natural Heritage System.
	acres (227 hectares) Although intended to be considered as part of the 2,400 hectares of potential Mixed-Use/Residential Lands contemplated through the Sustainable Halton Plan process, Milton staff strongly believe that Area H should be designated as a separate component, in that as it is to be centred on the proposed GO Station there exists a great potential in this area to develop a spectacular, truly mixed-use retail/transit node. In this manner, Milton staff's initial calculations have determined that upwards of 200,000 square metres or 2 million square feet of provincial or GTA-level retail activity is available and desirable in this area. What is intended is that strict urban design guideline control would required a mixed use community that is based upon mixed-use buildings combining retail, employment, office, institutional, and residential opportunities at an ultimate density of at least 100 employees/residents per hectare.	The Highway 401 Corridor has been prioritized for employment land development. The lands surrounding the potential GO Transit Station in east Milton have the potential to support transit oriented development. These lands are envisaged as being a good location for a mix of higher density residential, office and community uses, provided that land use compatibility is assured
	Area I – Potential Mixed-Use/Residential Area – 5,370 acres (2,173 hectares) The three quadrants that make up the potential Mixed-Use/Residential Area I provide the basic fabric to three residential secondary plan areas of approximately 40,000 people each at an overall density of 50 employees/residents per hectare, in accordance with the Provincial Places to Grow Plan for greenfield development. The positioning of these areas lend themselves to the build-out of the Milton Urban	Sustainable Halton is planning for approximately 1,680 hectares of potential mixed-use/residential area (See <i>Report 3.08: Working Paper #2</i> , Urban Strategies Inc.). Areas I and C

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	planned extended servicing in Region of Master Serviake full advallowing for	complete con ension of the lo frastructure fra Halton's Tran vicing Plans. vantage of the or extensive pa s. All in all, A ommunity.	ocal and region amework, in sportation a The areas contiguous na arks and op	onal transportational transportation accordance with which with accordance within atural heritage on space an	tion and with the stewater n Area I system, d trails	are being considered as potential areas for new mixed/use residential development.
		he Town of Measummary is a		Preferred La	nd Use	
	- 1 Ha - Mi	otal Employmer 1,200 hectares alton Hills 240 hectares ilton (Areas A, I 960 hectares				
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	developmen 60,000 emp ratio), both work out to again meet targets. With staff has cal of ICI land	n the assumption that targets are a ployees (assurthe residentian be 50 emplots the Provinch respect to the lculated that apple ds will be reto the year 20.	approximately ning a 0.5 and emplo yees/residen ial Places to proximately equired to a	y 120,000 peo employee to yment density its per hectare o Grow Plan mployment abs 1200 to 1300 h accommodate	ple and resident targets , which density corption, nectares 60,000	Please also refer to Hemson Consulting's Report 3.07, Sustainable Halton: Accommodating Growth to 2031.
		d Land area to				
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	e S	es by Jobs Sector	Sq. Feet Req'd	Lot Size* (Sq. Ft)	HA's Req'd	
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	process and lastly, builds upon the First Principles of Growth that have recently been endorsed by Town of Milton Council.						
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	"Balance" is one of the key goals of Milton's Strategic Plar (DM2: Shaping Our Future), whether it relates to a balance						
	between residential and non-residential growth or the balance						
	between developable and non-developable land. It therefor bears repeating that "as a balanced community, we see						
	bears repeating that "as a balanced community, we see a Milton that is":						
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Source	SUBMISSION	Response
	Strategic Plan as well as Milton's First Principles of Growth, in that it allows Milton, in conjunction with the Region of Halton, to control the balance of growth through the necessary phasing and timing, and; thereby, the identified development allows the Town of Milton to control its own destiny, from both a land use and financial management perspective.	
	In conclusion, in accordance with the justification presented within Report No. PD-076-08, Milton staff are recommending that Milton Council endorse Appendix A – the Town of Milton - SHP Preferred Land Use Concept, noting that the Region of Halton will identify two or three refined options for detailed evaluation, including a detailed financing analysis and comparison, and that the Sustainable Halton Plan process will continue to invite Local Area Municipality participation over the next year.	
	Relationship to the Strategic Plan	
	Report No. PD-076-08 and its recommendations relate to the Town of Milton's Strategic Plan (Destiny Milton 2: Shaping our Future) goals and objectives, specifically:	
	GOAL – A responsible cost effective and accountable local government	
	 Participate fully in Region led exercises that are intended to maintain and enhance quality of life. Ensure that Milton's interests and needs are known at the Regional level. Engage other levels of government to ensure that the interests of Milton residents and business owners are known. 	
	GOAL – Well-managed growth, well-planned spaces	
	 Encourage the provision and maintenance of an appropriate mix of residential, commercial, industrial and institutional areas. Encourage the provision of a healthy supply of employment and commercial lands to serve local needs at all times. Encourage the siting of employment areas in locations that are easily accessed by 400 series highways. Ensure that the Town demonstrates leadership in any future urban expansion to ensure that new development is as cost effective as possible. Ensure that the Town demonstrates leadership in any future urban expansion to ensure that new development is as cost effective as possible. 	

Source	SUBMISSION	Response
	GOAL – A safe, liveable and healthy community Encourage the establishment of a healthy community that is made up of an interconnected system of open spaces, walking trails, bicycle routes and natural heritage features. COAL A diverse and systematicable segments:	
	 GOAL - A diverse and sustainable economy Encourage the development of regional-scale retail uses in appropriate locations to ensure that all consumer needs can be met in the Town. Work with other levels of government to encourage additional investment in Milton. Support a post-secondary educational presence in the Town. GOAL - A thriving natural environment that is a valued 	
	Encourage the decision-making process to be supported by an understanding of the natural environment, including values, opportunities, limits and constraints. Financial Impact	
	Financial Impact The recommendations contained within Report No. PD-076-08 have no immediate impact on the Town of Milton. However, if the First Principles that the Town of Milton has previously endorsed with respect to the Region of Halton's Sustainable Halton Plan process are not respected, specifically during the identification of a Preferred Land Use Concept, then the outcome may very well have a negative financial impact on the Town of Milton's ability to manage the anticipated future growth within Milton from 2021 to 2031.	
Town of Oakville Report No. PD: 122-08 September 12, 2008	PLANNING AND DEVELOPMENT COUNCIL MEETING DATE: SEPTEMBER 22, 2008 FROM: Planning Services Department DATE September 12, 2008 SUBJECT: Sustainable Halton – Comments on Phase 2 and Evaluation Framework LOCATION: Town Wide WARD: All	

Source	SUBMISSION	Response
	RECOMMENDATION	
	1. That the report on Sustainable Halton - Comments on Phase 2 and Evaluation Framework dated September 12, 2008 be received and forwarded to the Region and the local area municipalities; 2. That Regional staff consider the concerns and issues raised by Town staff in the report on Sustainable Halton - Comments on Phase 2 and Evaluation Framework and incorporate changes to the Sustainable Halton process to ensure the issues are addressed;	Recommendation #2: Regional staff have reviewed the concerns and issues noted in the report and have consulted with local municipal staff through the Sustainable Halton Working Group (comprised of Regional staff, Local Municipal staff, and Public Agency staff).
	3. That a fiscal analysis of the Refined Options with respect to servicing infrastructure be completed by the Region before any decision is made by Regional Council on the Refined Options;	Recommendation #3: A high level financial analysis of the impact of transportation and water and wastewater infrastructure associated with the refined Growth Concepts will be conducted. The analysis will provide high level costs of the Growth Concepts to assist in decision making towards the selection of a preferred land use option.
	4. That the process to determine the capacity for intensification continue to be a bottom-up exercise where the local municipalities provide the capacities to the Region and that this information be evaluated by the Region prior to any decision relating to greenfield development and consideration of a preferred growth option; and	Recommendation #4: The Region has adopted a "bottom-up" approach with respect to achieving the intensification targets established in Places to Grow. The Region has received Oakville's estimated number of residential intensification units to 2031 and has ensured that these numbers were considered in the intensification work.
	5. That Regional staff provide a qualitative scale for the evaluation criteria to enable measured evaluation of the options to be completed.	Recommendation #5: The Region has employed a qualitative assessment to the evaluation framework that responds to the effectiveness of each growth concept in attaining each goal and objective contained within the Framework. The intent of Theme 4 of the Evaluation Framework is to identify goals and objectives that will be addressed at the local municipal level through local

Source	SUBMISSION	Response
		planning processes. The Region will assume a monitoring role through Regional Official Plan policy direction. The goals of Theme 4 are not meant to form part of the evaluation process.
	6. That a cumulative environmental analysis, a cumulative air quality impact analysis and a traffic congestion impact analysis of the Refined Options be prepared by the Region before any decision is made by Regional Council on the Refined Options. EXECUTIVE SUMMARY	Recommendation #6: The matter of cumulative air quality impacts and other issues have been addressed in Report 3.11: Connecting Sustainability in Halton RegionFrom Policy to Practise.
	The Region of Halton through the Sustainable Halton review has recently completed "Phase II of Sustainable Halton - The Physical Structure Concepts 2021 - 2031 and the Final Evaluation Framework" and have requested comments from the local municipalities on the Five Refined Options and the Evaluation Criteria. The Region has also asked for a response to seven specific questions relating to the Five Refined Options for new growth areas.	
	A review of the Five Refined Concepts as well as the evaluation criteria has been completed by staff as part of this report in response to the Region's request This report outlines staff concerns, which have been raised throughout the process. Staffs main concerns are raised in the context of Oakville's growth requirements and objectives. The concerns can be summarized as the lack of an intensification analysis as part of the process and the need for balanced growth, the importance of the Trafalgar Road Corridor, support for the enhanced natural heritage system being proposed in all concepts; the importance of employment lands; and the need for a fiscal analysis of the alternative growth options. The report responds to the seven questions in the context of the issues and concerns raised.	Please refer to Recommendation #4 for a response to intensification. Achieving an activity rate for each of the Local Municipalities that reflects balanced, sustainable communities was a key consideration when refining the Growth Concepts through the Sustainable Halton Working Group. We agree with your comments. Trafalgar Road is an important north/south corridor in Halton Region and the focus of considerable investment. Trafalgar Road forms an important element of the Growth Concepts. The refined Growth Concepts illustrated in Working Paper #2: Concepts for Addressing Halton Region's Land Needs to 2031 (Report 3.08), by Urban Strategies Inc., have located potential new urban areas so as to reinforce the Trafalgar Road corridor. [B]
		Please refer to Recommendation #3

Source	SUBMISSION	Response
		for a response on the fiscal analysis.
	The five growth options are to be ranked against the goals and objectives contained in the Evaluation Criteria. The one that best achieves the Region's planning vision will be the recommended option. Each prevailing theme has identified approximately 15 - 20 specific criteria, as well as a defined means of how that particular criterion is to be measured against the 5 growth scenarios. Staff is concerned that as there is no weight being given to the criteria and there is an assumption that all criteria are to be considered equal.	The evaluation process will include a qualitative assessment of each of the goals and objectives in the Evaluation Framework. It will provide a relative comparison of the merits of each Growth Concept, which will be presented to Council for consideration. The evaluation process will not include weighting of the goals and objectives, nor will it involve tabulation or scoring. [A]
	The Region of Halton is seeking comments from the local municipalities and other interested agencies on the Five Refined Concepts as well as the Evaluation Framework by September 30, 2008.	3.7
	PURPOSE OF THIS REPORT	
	The purpose of this report is to provide Planning and Development Council with staffs comments on Sustainable Halton in response to the Region's request. Specifically, staff is responding to the Region's request to provide comments on the Evaluation Framework and the Five Refined Concepts for future growth in the Region, as well as the seven questions posed under the consultation on the Five Refined Concepts for consideration as part of the Region of Halton's Sustainable Halton planning process.	
	The report is structured to provide a summary of the background work completed on Sustainable Halton to date with the key reference documents attached. The report provides general comments on the Evaluation Framework, provides specific comments on the Town's concerns and issues with the Sustainable Halton process and the Five Refined Concepts and, a response to the seven questions posed in relation to the Five Refined Options.	
	BACKGROUND	
	On June 18, 2008 the Region of Halton considered Report No. PPW42-08 -Phase 11 of Sustainable Halton - The Physical Structure Concepts 2021 -2031 and the Final Evaluation Framework requested that all local municipalities provide comments on the Five Refined Concepts and the seven questions posed under the	

Source	SUBMISSION	Response
	Consultation on the Five Revised Concepts, as well as the Evaluation Framework. A copy of Report No. PPW42-08 and the Regional Council resolution are attached hereto as Appendix A.	
	To date staff and Regional Councillors have been involved in the Region's Inter-Municipal Technical Committee (IMTC) and the Inter-Municipal Political Committee (IMPC) for the Sustainable Halton Project and have been provided with regular reports to Regional Council on the status of Sustainable Halton. The Liveable Oakville Sub-Committee have also been provided with updates on the Sustainable Halton work as it has proceeded and were recently provided with an overview of the Five Refined Concepts and the Evaluation Criteria (July 2008).	
	Halton's Growth Management Strategy and the supporting Resource Management Strategies that make up the Sustainable Halton Plan are scheduled for completion by June 2009. The work program consists of four phases: Building Blocks, Strategic Planning, Decision Making, and the Official Plan Review. Phase 1, Building Blocks produced 22 technical background papers and. assisted the Region in the development of alternative policy approaches for growth and resource management, the definition of structural elements for growth and the formulation of key principles for complete communities.	
	Phase 2, Strategic Planning, is currently underway and has followed a consultative process involving the public, the Technical Advisory Committee, an Inter-Municipal Liaison Committee (in which the Town participated) as well as various agencies, municipal, regional and provincial staff. The Strategic Planning phase has involved the development of structural elements of growth to be used as a framework for the Region's Growth Management Strategy. The structural elements include enhancing the Greenlands System, protecting the Rural System, applying wise management of mineral resources extraction areas, maintaining and improving urban systems - transit first, extending the pattern of mixed-use nodes and corridors, protecting lands for employment uses, making the most of existing infrastructure and protecting critical infrastructure. The second phase also involved a series of consultations on the Principles of the Evaluation Framework. The consultation sessions were held in the fall of 2007 and there was additional consultation in 2008.	
	One of the focuses of Phase 2 was to translate the principles for complete and healthy communities from	

Source	SUBMISSION	Response
	Phase 1 into an Evaluation Framework which would help to identify important elements to be incorporated into the long-list of growth scenarios. The Evaluation Framework was then used as a tool to appraise the long-list of scenarios and to cull the list to the refined scenarios. The framework will then be used to test the refined scenarios to recommend a preferred growth scenario.	
	The Evaluation Framework is organized into a hierarchy of themes, goals and objectives. The themes are broad overarching key directions that structure the Evaluation Framework. The four key themes are:	
	1.Protecting What is Valuable;	
	2.Fostering Complete, Healthy and Sustainable Communities;	
	3.Ensuring Sustainable Infrastructure to Support Growth; and,	
	4.Promoting Health for All.	
	A complete copy of the Evaluation Framework is as Appendix B.	
	The nine initial growth concepts were developed during Phase 2. The discussion and analysis around the nine concepts led to a set of directions and refinements to establish the most appropriate locations for new mixed-use/residential and employment lands within the Primary Study Area. As a result of the directions, a refined set of concepts was developed and released in June of this year. The three refined concepts (referred to as the Five Growth Concepts), attached as Appendix C, include:	
	1.Milton-Centered - in which all of the new mixed- use/residential development is located in Milton;	
	2. a. and b. Milton-Georgetown (Low) in which population of approximately 20,000 people are allocated around Georgetown in two potential configurations with the remaining mixed/use residential land in Milton; and,	
	3. a. and b. Milton-Georgetown (High) in which a population of 40,000 people is accommodated n Georgetown, again in two potential configurations, with a	

Source	SUBMISSION	Response
	smaller amount of remaining mixed-use/residential land in Milton.	
	The three refined concepts provide for approximately 3,000 hectares of new urban land; 2,400 hectares for mixed-use/residential and 600 hectares for employment.	
	A series of public open houses have been held to obtain public input on the Five Refined Concepts. The public open house for the Town of Oakville was held on Wednesday, September 10, 2008.	
	The seven questions posed by the Region in conjunction with the consideration of the refined concepts are as follows:	
	Do they capture Halton's Planning Vision of landform permanence?	
	Do they meet Halton's definition of Sustainable development?	
	3. Do they promote complete, healthy and sustainable communities and the adequate provision of housing?	
	4. Do they adequately capture the concept of urban separations?	
	5.Do they encourage economic prosperity and is the Highway 401 corridor the best location for new employment?	
	6. Do they promote sustainable infrastructure?	
	7. Do they adequately address the need for new residential and employment land?	
	DISCUSSION	
	The Evaluation Framework	
	The Evaluation Criteria is organized into a hierarchy of themes goals and objectives. The themes are broad overarching key directions that structure the evaluation framework. The four themes are:	
	1.Protecting What is Valuable;	

Source	SUBMISSION	Response
	2.Fostering Complete, Healthy and Sustainable Communities.	
	3.Ensuring Sustainable Infrastructure to Support Growth; and,	
	4.Promoting Health for All.	
	The five identified growth scenarios are to be ranked against the goals and objectives contained in the Evaluation Criteria. The one that best achieves the Region's planning vision will be the recommended option. Each prevailing theme has identified approximately 15 - 20 specific criteria, as well as a defined means of how that particular criterion is to be measured against the five growth scenarios. The Evaluation Criteria acknowledge that goals and objectives of the various themes are complex and at times inter-related, and states that such redundancies will be accounted for in the final assessment of the options. Further, it states that the measures of the goals and objectives will not be weighted but the overarching determination in arriving at the preferred option will be	
	based on the "degree of adherence" to the Region's planning vision.	
	The concern with the approach to the Evaluation Criteria and their application to determine a preferred option is two-fold. First, by not weighting any of the criteria there is an assumption that all criteria are to be considered equal. This takes away from the need for a qualitative analysis using measures for each of the criteria to provide for a true ranking of the options. There is also no indication of whether some criteria will be more important than others. There are also criteria that cannot be assessed in evaluating the options such as "intensification" as they are unknown.	See previous response [A] regarding the evaluation process.
	There is also a concern regarding the timing relating to when the evaluation will be measured. In the case of many of the specific criteria, the stated means of measurement is intended to be determined at the local level, through a planning process of an Official Plan, Secondary Plan or subdivision process. The Region would simply undertake an on-going monitoring function to ensure that the intent of the stated criteria is in fact being achieved. Many of the affected criteria are concerned with land use, transportation, environmental and sustainability matters. Does this mean that the "degree of adherence" of the criteria can only actually be assessed after the municipal planning	Please refer to Recommendation #5 with respect to the Evaluation Framework.

Source	SUBMISSION	Response
Source	exercises are complete, and after the decision has been made on a preferred option? The concern is that, although the intent of the goals and objectives of the individual themes are well-intentioned, they cannot be properly measured as the determination will be made as to the preferred option before the planning exercises have even commenced. The Refined Growth Concepts In reviewing the Five Refined Concepts it is important to consider the directions for growth in relation to the vision and objectives of the Town of Oakville and how the refined concepts for Regional growth affect the Town's	RESPONSE
	direction for growth (Interim Growth Policies in OPA 275) and emerging policies from the six major studies for Liveable Oakville. The following summary provides general comments on what staff believes are some of the key issues relating to	
	the Five Refined Concepts. 1. Balance of Growth - Greenfields and Intensification In order to achieve balanced growth in the Region there	
	must be consideration given to the capacity for intensification in order to determine the actual need for new urban areas. The Town's main concern in relation to ensuring balanced growth is the process by which decisions in relation to new growth areas are being considered. There is an absence of an intensification analysis to determine whether the capacity for intensification at the minimum levels identified in Places to Grow is achievable in the existing urban areas. Any formal decision on the addition of greenfield development lands should be completed in concert with the intensification capacity analysis, not in the absence of such work.	Please refer to previous responses (Recommendation #4).
	The area municipalities are in the process of completing intensification work to provide the Region with the projected number of units that can be provided through intensification. The Region has requested that this information be provided by traffic zones in order to determine servicing infrastructure requirements. It is important that a co-operative, bottom up approach to determining the intensification capacity for the Region continue. Until the capacity for intensification has been established, a decision relating to the extent of new growth areas and the selection of a refined growth option is premature.	

Source	SUBMISSION	Response
	2. Trafalgar Road Corridor	
	The Trafalgar Road Corridor between Milton and Oakville links the QEW to the 401 and is clearly the most important corridor for integrating land uses and supporting new and existing employment uses along the corridor for the Town.	We agree. Please refer to previous response [B].
	The North Oakville East Secondary Plan was created in a holistic manner to develop an urban mixed use community (residential, employment and commercial uses). Urban Core Areas, particularly the Trafalgar Urban Core Area, are intended to ultimately provide for primarily mixed use development which will be the densest in North Oakville. The Trafalgar Road is an important historical route that provides a major physical link from a transportation perspective from the Trafalgar Urban Core Area to other urban centres in the Town, including the Uptown Core, Midtown Core and the Old Oakville Downtown area.	
	A Regional transportation system focusing on Neyagawa or RR 25 (Bronte Road) is not reflective of the Town's development pattern and transportation capacity given the lower density development within the West Oak Trails.	
	The Milton-Centered growth option identifies Trafalgar Road as a primary future corridor for growth (option #1). This option, similar to the North Oakville East Secondary Plan identifies Trafalgar Road as a "Potential Mixed-Use Corridor".	
	3.Enhanced Natural Heritage System	
	Consistent with the North Oakville East Secondary Plan an enhanced greenland system is considered in all five of the Refined Growth Concepts and is strongly supported. The Natural Heritage System option adopted by Regional Council (Enhanced Ecological Integrity) represents the most robust option and is the baseline for identifying new urban lands to 2031.	
	The proposed enhanced Natural Heritage System with the centre for biodiversity, while a positive concept to consider as part of the refined options, is voluntary. Its location is questionable and may present problems for long term viability with proposed surrounding development. An alternative location could reduce	The centre for biodiversity in the vicinity of Trafalgar Road, south of Britannia Road has been relocated based on a review by North-South Environmental as a result of

Source	SUBMISSION	Response
	constraints on the protection of the centre and reduce the constraints on the development of employment and higher density lands along the Trafalgar corridor. 4.Employment Land	comments received. Please refer to Report 3.02, Sustainable Halton: Natural Heritage System Definition and Implementation, prepared by North-South Environmental which is now available.
	With respect to employment uses, staff supports the importance of employment uses along 400 series highways such as Hwy. No. 401 and Hwy. No. 407. Employment uses focused along Hwy. No. 401 building on the existing based are expected. Staff would expect that as more employment land is required Hwy. No. 407 frontage would be considered. The North Oakville East Secondary Plan envisions a business park located along Highway 407 (south side) that provides a range of employment opportunities, including prestige employment. and office development at Trafalgar Road and Highway 407. These areas should definitely be considered if further employment uses are necessary.	Hemson Consulting Ltd has completed an updated land supply analysis which has increased the employment land needs to a total of 1,100 hectares. The detailed land supply analysis can be found in <i>Report 3.07: Sustainable Halton: Accommodating Growth to 2031.</i> The proposed employment lands are located along the Highway 401 corridor, north of Highway 401 along the future James Snow Parkway, along Highway 407 in east Milton, and along Tremaine Road around the CN rail line.
		The Region recognizes the importance of protecting strategic employment lands beyond 2031 and will be providing protection through the Region's statutory five year Official Plan Review process.
	It also appears from the Five Refined Options that the CN Rail inter-modal site in Milton and the additional CN Rail land holdings have not been considered as part of the employment lands for 2031 and are not shown in the Five Refined Options. The Region has indicated that CN Rail does not intend to pursue the inter-modal site at this time but will provide rail to industry service. Confirmation of this position from CN Rail should be provided and noted as part of the Sustainable Halton process.	Approximately 200 hectares of land in south Milton adjacent to the rail line are shown as employment lands in the refined Growth Concepts. Concept maps can be found in the report Working Paper #2: Concepts for Addressing Halton's Land Needs to 2031(Report 3.08), prepared by Urban Strategies Inc
	5. Fiscal Impact	Through their submission dated September 12, 2008, CN has advised that they are not intending to develop an intermodal facility, but a rail based employment area.
	The most important analysis that needs to be undertaken in relation to the Five Refined Concepts is the fiscal impact analysis for each. The analysis associated with the servicing requirements and costs associated with each option must be completed in order to ensure the selected option provides for the most efficient and cost-effective servicing option. This is reinforced by	A high level financial analysis of the impact of transportation and water and wastewater infrastructure associated with the refined Growth Concepts will be conducted and will demonstrate at a high level, the costs

Source	SUBMISSION	Response
JOURGE	one of the main principles of the Provincial Policy Statement which is to manage and direct land use to achieve efficient development and land use patterns. Section 1.1.1.a of the PPS notes that "healthy, liveable and safe communities are sustained by promoting efficient development and land use patterns which sustain the financial well-being of the Province and the municipalities over the long term".	of the Growth Concepts to assist in decision making towards the selection of a preferred land use option. [C]
	The Five Refined Concepts must be evaluated on the basis of the required public investment in needed infrastructure to both service and maintain any new growth areas before any decision is made. The fiscal impact must be one of, if not the most important consideration in the review of the options. No decision can be made until this analysis is undertaken.	
	Seven Questions From the Town's perspective, the refined concepts should be reflective of the process that refined the initial growth concepts and should have been developed on the basis of applying the Evaluation Framework. As such, each of the refined growth concepts should address the seven questions posed in a positive manner.	
	Do they capture Halton's Planning Vision of landform permanence?	
	Each of the refined concepts provides for the preservation of the enhanced Natural Heritage System. In relation to the extent that growth will impact landform performance, it is unclear which of the refined concepts will have more or less impact on landform performance. The Milton Centered Concept (1) will impact the enhanced Natural Heritage System in south Milton to the greatest extent whereas the Milton and South Georgetown 3a. and 3b. concepts would appear to have the greatest impact on the enhanced Natural Heritage System in Halton Hills. Concepts 2a and 2b would appear to both provide some level of impact on the enhanced Natural Heritage System in both Halton Hills and Milton.	
	As was noted earlier in this report, while the location of a biodiversity centre is a good concept, the location has not been justified and there is concern about the location in the refined options which would provide significant constraints on the ability to develop employment uses along the Trafalgar corridor.	The centre for biodiversity in the vicinity of Trafalgar Road, south of Britannia Road has been relocated based on a review by North-South Environmental as a result of comments received. Please refer to Report 3.02, Sustainable Halton:
	2. Do they meet Halton's definition of Sustainable	Natural Heritage System Definition and Implementation prepared by

Source	SUBMISSION	Response
	development? The Sustainable Halton process is guided by the definition of sustainable development that is found in the Regional Official Plan. The Regional Official Plan defines sustainable development as development which "meets the needs of the present without compromising the ability of future generations to meet their own needs".	North-South Environmental which is now available.
	In order to respond to this question in relation to the Five Refined Options, a fiscal analysis would have to be completed to determine which option can be developed the most efficiently and maintained the most effectively.	See previous response (Recommendation #3).
	3. Do they promote complete, healthy and sustainable communities and the adequate provision of housing?	
	For Halton Region a complete community is one that promotes and celebrates diversity, livability, physical health and well-being, and accessibility. Given the evolution of the refined concepts, there have clearly been elements of the Evaluation Framework which have stressed the importance of complete, healthy and sustainable communities. The degree to which the refined concepts address the ability to provide for complete, healthy and sustainable communities will depend on the ability to provide for good land use connectivity, extended mixed use nodes and corridors, transit and efficient infrastructure.	Comments noted.
	In relation to potential mixed-use/residential areas the Milton Centered Concept	
	(1) would have the ability to have residential areas be serviced by an extension to existing services in Milton. The question of whether the concepts provide for the adequate provision of housing will depend on the forms of housing provided through the local Official Plans and the market response.	Comments noted.
	4. Do they adequately capture the concept of urban separations?	
	The concept of urban separators evolved through the ROPA 8 process at a time when the intention was to provide distinct communities. While there is some merit to providing distinct separation between rural and urban uses to reduce conflicts, there is has also been a strong shift in planning policy towards ensuring connected communities.	Comments noted.
	Where such separators provide for the reduction in land	

Source	SUBMISSION	Response
Source	use conflicts and protect natural systems they should be considered. Where they create disconnection between communities and increase the cost of efficient servicing expansions, they should not be considered as a positive factor in evaluating the growth options. 5. Do they encourage economic prosperity and is the Highway 401 corridor the best location for new employment? New employment lands are illustrated along the Highway 401 corridor in a similar way in all of the concepts. The only variation in terms of employment lands is where Milton's Derry Green Corporate Business Park is relocated elsewhere in the Town and replaced by mixed-use/residential lands. It is recognized that the 407 corridor lands will provide for employment opportunities and need to be considered as further employment land becomes necessary. The 401 corridor lands are certainly a key element to be considered in the growth options. 6. Do they promote sustainable infrastructure? Without a detailed assessment of the phasing of the Regional infrastructure and a fiscal impact analysis, it is difficult to assess the extent to which the refined options promote sustainable infrastructure. Given the limitations on servicing in Halton Hills, it would appear that the refined concepts with mixed-use/residential development in Halton Hills may not have the same level of sustainable infrastructure as those with potential areas in Milton. 7. Do they adequately address the need for new residential and employment land?	The refined Growth Concepts illustrate 1,100 hectares of new proposed employment, located along the Highway 401 corridor, along Highway 407 in east Milton, and straddling Tremaine Road immediately south of the Milton urban area (see Report 3.08: Working Paper #2: Concepts for Addressing Halton Region's Land Needs to 2031). See previous response (Recommendation #3).
	Again, on the basis that the refined concepts have evolved from the evaluation of the nine initial concepts using the Evaluation Framework and based on the land supply requirements from the Hemson study and the information from the Phase 1 process, it would appear that the options do provide for adequate land for new residential and employment needs. The ability to develop new lands for employment and residential uses at a density that is sustainable is a critical component of the growth management exercise. To assume that the same level of urban form and density can be achieved in Halton Hills as it can in Milton raises some questions given the current urban structure in south Georgetown.	Comments noted.

Source	SUBMISSION	Response
	The larger question that must be addressed as part of the Sustainable Halton process is whether the refined concepts should be addressed in more detail, including a financial assessment, once the levels of intensification in all four municipalities have been better assessed and established. The Region's ability to meet the growth requirements of the Province will be a combination of the new growth areas and the capacity for intensification. Any decisions relating to the Five Refined Concepts should be made after the capacity for intensification has been established and with the understating of the financial impacts of each option.	See previous response [C] on the fiscal analysis.
	CONCLUSIONS AND RECOMMENDATIONS	
	This report provides Planning and Development Council with an overview of the key issues and concerns staff has with the Five Refined Options and the Evaluation Framework as well as the Sustainable Halton process. Based on the concerns raised, it is recommended that Planning and Development Council receive the report from staff and recommend that Regional staff consider the concerns raised by Town staff and incorporate changes to the Sustainable Halton process to ensure a fiscal analysis of the Refined Options is completed with respect to servicing infrastructure before any decision is made by Regional Council and that the capacity for intensification as provided by the local municipalities is evaluated in the context of the needed land for greenfield development.	See previous response [C] on the fiscal analysis.
	Regional staff were directed to consult with the local municipalities, the Conservation Authorities and the School Boards on the Five Refined Concepts and the seven questions posed around whether the Five Refined Concepts address the questions and desired outcomes that are inherent to Sustainable Halton as well as the Evaluation Criteria. A regional staff report on the results of the consultation in relation to the Five Refined Concepts and criteria is scheduled to be presented to the Planning and Public Works Committee on October 22, 2008.	
	Halton process and the Five Refined Concepts and, a response to the seven questions posed in relation to the Five Refined Options.	
	CONSIDERATIONS	
	A) PUBLIC	

Source	SUBMISSION	Response
	No public notice is required. However, the Region of Halton held a Public Information Centre workshop in each of the four local municipalities to receive feedback on Phase 11 of the Sustainable Halton exercise. The Oakville PIC was held on Wednesday September 10, 2008 at the River Oaks Community Centre. B) FINANCIAL Financial implications are not known at this time.	
	C) IMPACT ON OTHER DEPARTMENTS AND USERS The impacts of the Sustainable Halton exercise on other departments, is not known at this time. D)CORPORATE AND/OR DEPARTMENT STRATEGIC PRIORITIES Not applicable.	
Public Agency	Comments	
Canadian National June 18, 2008	Re: Phase II of 'Sustainable Halton' Planning Program – Project No. 0217 This letter is with regard to the Growth Options recommended in the captioned report vis a vis the lands owner by CN astride its Halton Subdivision trackage in Milton, as shown on Figure	
	 While we are greatly disappointed in the abrupt change between the Phase II Refined Concepts and the references to the CN lands in earlier published materials, in the interests of brevity this morning, we focus attention on what we believe to be two issues of a serious concern for future Employment Areas in Halton. The Advantages of the CN Lands in Milton it is no secret that the prospect of continuing high, or even higher costs for petroleum-based fuels is re-ordering the economics of transportation, including the movement of goods as well as people. Just as the latter is adding further impetus to public transit initiatives, the former is reflected in the enhanced demand for employment lands which enjoy direct rail service. Helped by the fact that the long axis of the concession block more or less parallels the mainline trackage, CN's Milton Lands offer demonstrable potential for both. 	Through regular meetings of the Sustainable Halton Working Group (comprised of Regional and Local Municipal planning staff, and Public Agency staff), discussions have taken place regarding the potential designation of additional employment lands to 2031. Recent work completed by Hemson Consulting Ltd. concluded that based on additional information (which included previously unavailable 2006 Census data), there is a need for approximately 1,100 ha of employment. Approximately 200ha of lands in south of Milton along Tremaine Road adjacent to the rail

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Source	SUBMISSION	Response
	Early in the Sustainable Halton process, this potential was recognized in the November 2007 background report entitled "Urban Structure: Potential Long Term Growth Areas" (Hemson Consulting) which stated on P.6:	line have been included. Please refer to the report, <i>Sustainable Halton: Accommodating Growth to 2031(Report 3.07)</i> , by Hemson Consulting Ltd.
	'a. Area Surrounding CN Intermodal and Halton Waste Management Site in Milton	
	The area around the future CN Intermodal and Halton Waste Management site in southern Milton has existing transportation advantages in its proximity to Highway 407. If the CN Intermodal terminal is built, that would add a very significant additional transportation advantage.'	
	This employment potential of the CN lands was recognized in three of the original nine growth options and was specifically referred to in Section 4.2 Outcomes and Conclusions (p. 35) as follows:	
	"The area around the CN Rail corridor has been considered as a special location that needs to be considered as part of ongoing plans. It is not being regarded as a priority area for new employment areas until such time as more formal plans or proposals come forward"	
	In fact, the Sustainable Halton Team were made aware in early March 2008 of CN's intention to participate in the consultation process attending discussion of the first set of proposed growth options which, at the time, were expected to be published on April 9th. Specific proposals for the staged development of the CN lands, in pace with internal and external incremental infrastructure improvements, were prepared for submission after that date. Town of Milton staff had been kept abreast of CN's objectives throughout.	
	2. A Flawed Selection Process Notwithstanding all of the positive indicators set out above, Sustainable Halton's Phase II Report peremptorily presents a short list of five growth options, all of which wholly ignore the CN lands, and proposes a consultation process which effectively forecloses and further consideration of the employment potential of the CN lands, or of the specific staffed development proposals which have been specially prepared for that purpose.	The release of the five concepts in June 2008 was to start the discussion. As a result of comments we have received from the Local Municipalities, the public and stakeholders, the Region has increased the amount of employment lands to 1,100 ha which includes a
	Most disappointingly, neither Section 4.3 of the Phase II Report, which presents the five "Refined Concepts", nor Section 5.0, which announces "Conclusions and Next Steps" offers any rationale for totally dismissing the obvious advantages of the CN lands. Surely those who have followed and participated in the process so far are	portion of the CN lands.

Source	SUBMISSION	Response
	entitled to have a continuing role in the final selection of future growth areas. Accordingly, we urge that Council, in directing the next steps in the Sustainable Halton category, ensure that within the Employment Lands category, provision is made for a thorough examination of the potential for the CN Milton lands to address the future economic imperatives of goods transportation for Halton industry and to exploit synergistic opportunities with the major land uses in its immediate vicinity. Be assured that CN is prepared to put forward its specific plans to do so as soon as can be conveniently arranged with the Sustainable Halton Team and the Town of Milton. In the meantime, we are obliged for your attention to this submission.	Refer to previous response.
Bousfields Inc. for Canadian National September 12, 2008	Re: CN Lands, Milton As you are aware, we serve as planning consultants for CN in connection with the captioned properties. On our clients' behalf we are pleased to submit herewith two copies of each of four reports prepared in support of CN's proposal to create a direct rail service industrial park astride its Halton Subdivision within the concession block bounded by Britannia Rd., Tremaine Rd., Lower Base Line Rd. and First Lin (Lots 1 to 5, Con 1) in Milton. The four reports are: "The Benefits of Developing CN's Lands in Milton", The Centre for Spatial Economics, September 2008; "Planning Rationale – CN Direct Rail Serviced Industrial Park, Milton", Bousfields Inc., September 2008 "Functional Servicing Report". Sernas Group, September 2008 "Transportation Considerations", BA Group, September 2008 They are submitted in response to the invitation for public comment on the 'Five Concepts' for long term growth posited in Working Paper #1, "Locating New Urban Land" (June 2008), published as part of the 'Sustainable Halton' planning program. The first report explains the growing importance of direct rail service for the movement of heavy goods and materials and draws attention to the environmental positives that stem from the fuel efficiencies of transportation by rail. The second presents a plan which capitalizes on the physical and locational advantages of the CN lands for the creation of a	

Source	Submission	Response
JOURGE	new direct rail service industrial park which will be needed to attract a discrete and expanding segment of the industrial land demand to Halton. The third report demonstrates how an initial phase can be serviced by a combination of trunk infrastructure already planned by the region and supplementary local works to be installed by CN. The fourth report shows how future intra-regional transportation movement would benefit from the centrality of the CN location. As well, it describes how the first phase can be initiated with relatively modest additions to road system improvements already planned. It is hoped that the Sustainable Halton Team will concur that, taken together, the four reports make a convincing case for inclusion of CN's rail-oriented industrial park in the inventory of Employment Lands planned to meet long term need in Halton, and will therefore recommend as much to Regional Council. In the meantime, we are obliged for your attention to our submission. THE BENEFITS OF DEVELOPING CN'S LANDS IN MILTON Centre for Spatial Economics SECTION 1 INTRODUCTION This report was prepared by the Centre for Spatial Economics (C4SE) in the summer of 2008 on behalf of Canadian National (CN). It notes that Milton will need to accommodate thousands and thousands of new jobs between now and 2031 if Halton is to fully comply with Places to Grow (the Province of Ontario's growth plan for the Greater Golden Horseshoe).	The reports provide a significant amount of detail that assists the Region in understanding how the CN lands can help to meet the Region's long term employment needs.
	The report demonstrates that CN's lands in Milton provide the Region with a unique opportunity to provide jobs in an area close to where most of the Region's population growth is slated to occur. Development of these lands will foster a geographic balance in growth between people and jobs and expand Milton's ability to offer a wider range of employment land choices. Their development will shift the movement of goods toward rail supportive industries and associated business park activities and will reduce, in turn, both greenhouse gas emissions and traffic congestion. No other potential employment lands site in Halton provides the Region with the ability to reach so many of the Province's growth plan goals. The report further demonstrates that including these lands in any expansion of the Region's urban area employment lands would benefit Milton, Halton and Ontario by enhancing their ability to attract highly skilled workers to the area and by generating development charge and property tax revenues that would expand the range of service and	Hemson Consulting Ltd has completed an updated land supply analysis (see <i>Report</i> 3.07, <i>Sustainable Halton: Accommodating Growth to 2031</i>). Based on additional information and further analysis of the type of employment development occurring in Halton, the employment land needs has been increased to a total of 1,100 hectares. Included as part of this 1,100 hectares is approximately 200 hectares of employment land along Tremaine Road in south Milton, adjacent to the rail line. [A]

Source	SUBMISSION	Response
	infrastructure opportunities the Region and Town could provide to the community.	business, CN, and a willingness to develop for employment uses needing rail and a central location within the Greater Toronto area, is an economic development opportunity for the Region. [B]
	These lands are part of those obtained by CN prior to its announced intention in 2001 to build an intermodal facility in the Town of Milton. For that purpose CN acquired approximately 1,000 acres (about 400 hectares). With changes since that time in CN's operations these lands are no longer required for intermodal purposes. CN now sees a significant opportunity in the development of a portion of these lands for railway supportive industrial and associated purposes. The lands in question are bounded by Tremaine Road (west), Britannia Road (north), First Line (east) and Lower Base Line Road (south) and are situated directly west of Halton's Waste Management Site.	Comments noted by staff.
	The remainder of this report describes the geographic, demographic, economic and policy benefits of developing these lands for railway supported industrial purposes.	
	SECTION 2 THE GEOGRAPHIC, DEMOGRAPHIC AND ECONOMIC CONTEXT OF MILTON The Town of Milton is situated in the northwest corner of Halton Region, the western gateway to the GTA. Milton borders to the west on the City of Hamilton and to the south and east on Halton's other three constituent municipalities: Burlington, Oakville and Halton Hills. The GTA and Hamilton (GTA+H) today account for a combined total population of 6.5 million people, making it the fourth heaviest concentration of people and jobs in the US and Canada. The GTA+H has been growing at an average annual rate of 100,000 people since 2001, accounting for two thirds of Ontario's annual growth over that period, and at a pace rivalling that of the fastest growing metropolitan areas in absolute terms in the US and Canada (New York, Los Angeles, Dallas and Houston). Investors have increasingly favoured the area as a location for industrial, office and commercial purposes, spurred by financial sector deregulation and Canada's free trade agreements in the late 1980s and early 1990s, and by the area's ready connectedness to the US border via the nation's heaviest concentration of highway, rail, marine and air transportation infrastructure.	
	Milton is one of the fastest growing communities in the area. Between 2001 and 2006 census data reveal that Milton was the 7th fastest growing municipality in the GTA+H in absolute terms (growing at an average annual rate of 4,500) and that it was <i>the</i> fastest growing municipality in relative terms (growing at an average annual rate of 14.3 percent). The GTA+H includes 26 municipalities altogether; every one of the six	

Source	SUBMISSION	Response
	municipalities that grew faster than Milton in absolute terms over this period did so from a starting base at least triple that of Milton's.	
	Milton's population had hovered around 32,000 people through most of the 80s and 90s, unable to grow due to water and waste water capacity constraints. In the late 1990s the Region of Halton spent \$1 billion constructing major trunk water and waste water mains along Highway 25, connecting Milton to Lake Ontario, and thus laying the groundwork for a significant expansion of the Town's population, dwelling and employment base.	
	This increased capacity has had the intended effect: from 2001 to 2007 housing starts averaged almost 1,600 per year in Milton; the pace established over the first six months of 2008 suggests starts for all of this year could reach 3,500.	
	In other words, over the first 8 years of this decade 14,500 new homes will have been built in Milton in a municipality that in 2001 was home to only 10,700 units. C4SE estimates that the continued strong pace of new dwelling construction in Milton means its population could reach 70,000 people this year, up from 54,000 in 2006 and 31,500 in 2001.	
	Halton Region's most recent projections (<i>Best Planning Estimates of Population, Occupied Dwelling Units and Employment, 2007 to 2031</i> , April 2007) call for Milton's population to reach 147,400 by 2021. These same projections call for the population of Halton Region to reach 628,900. The Province of Ontario's <i>Places to Grow</i> – which outlines Provincial expectations and policies regarding population and employment growth throughout the Greater Golden Horseshoe – calls for Halton's population to reach 650,000 by 2021, or 21,100 more than accounted for in the Region's latest projections. Furthermore, <i>Places to Grow</i> calls for Halton's population to grow by <i>another</i> 20 percent between 2021 and 2031 to reach a total of 780,000 by that year. In other words, the Province is expecting Halton's population in 2031 to reach a level twice that of its level in 2001.	
	Milton has long been regarded by Halton as a major future growth centre within the Region (that, after all, is why the "big pipe" was built). Since the Province's targets for Halton are far more ambitious than the 2007 official projections from the Region, the Centre anticipates that Halton's population target for Milton for 2031 – once its projections have been brought into compliance with those of Ontario's growth plan – could exceed 250,000 people.	
	The employment base of the Town continues to grow alongside the expansion underway in its population. Between 2001 and 2006 census data reveal that employment on a place-of-work basis (jobs provided by employers based in	

Source	SUBMISSION	Response
	Milton) grew from about 20,175 to 24,760, or by almost 23 percent, the 4th fastest gain in relative terms among the 26 municipalities comprising the GTA+H.	
	The Town's employment base is growing in part because of the growing service base necessitated by its expanding population base (that is, its community based jobs). Of greater interest, however, is the fact that the number of manufacturing jobs in Milton (its economic base jobs) grew from 4,750 in 2001 to 5,105 in 2006, a gain of almost 8 percent. While the 8 percent gain in manufacturing jobs might appear modest compared to the 23 percent gain achieved by the Town in its overall level of employment, Milton's gain in manufacturing jobs takes on gargantuan proportions considering that the total number of manufacturing jobs <i>fell</i> between 2001 and 2006 across each of the GTA+H and the province at large by about 9 percent. Milton was among the	
	top five performers across the GTA+H in terms of manufacturing employment growth in percentage terms. Transportation equipment manufacturing accounted for 2,420 of Milton's 5,105 jobs in manufacturing in 2006, or almost half. Interestingly, the number of jobs in transportation equipment	
	manufacturing in Milton grew by 420, or by 21 percent, between 2001 and 2006. This, too, is a remarkable achievement given that transportation equipment jobs fell over that period by 4 percent province-wide and by 3 percent within the GTA+H. Again, Milton was one of but a handful of municipalities within the GTA+H to achieve a gain in transportation equipment manufacturing over that period.	
	Though the auto industry in Ontario – indeed throughout most of North America – has shed many jobs in recent years, and though it is not expected to generate many new jobs in the future, the Centre projects that the volume of auto production will continue to increase in Ontario in the future, and that the auto sector will sustain its position as the largest manufacturing industry in the province in the decades ahead.	
	Auto production in Ontario is going through a spatial redistribution reflecting the relative decline of production in the eastern portion of the GTA+H – stemming in part from the relative decline of production among North American producers – and the relative gains made by offshore producers located in or close to the western portion of the GTA+H. The choice of auto producers to increasingly locate	
	west of the GTA+H no doubt stems in large part from the area's transportation advantages with respect to reaching US markets. Western GTA+H locations eliminate the need to move product through the highly congested GTA.	
	The Census data reveal that Milton has already gained from this re-distributional trend. The CN lands in Milton provide the Town with an opportunity to attract more companies in the automotive and other fields that are seeking rail serviced	

Source	SUBMISSION	Response
	Such activities are among those that are the most rail supportive. To continue to attract such industries Milton needs to expand its inventory of rail serviceable lands. The CN lands provide Milton and the Region with a unique opportunity to do so.	
	SECTION 4 THE LAND PLANNING POLICY FRAMEWORK The objectives of the Province's growth plan for the Greater Golden Horseshoe (GGH) are wide ranging. Its overall goals are summarized by the statement below from the introduction of the plan:	
	Without properly managing growth, communities will continue to experience the negative aspects associated with rapid growth, such as increased traffic congestion, deteriorating air and water quality, and the disappearance of agricultural lands and natural resources.	
	The plan proposes to deal with these issues through policy directions that direct growth to already built up areas; provide strict criteria for boundary expansions; promote transit supportive densities and a healthy mix of residential and employment land uses; preserve employment areas for future economic opportunities; identify transportation networks and other infrastructure to support growth; identify and enhance the conservation of natural systems and prime agricultural areas; support the protection and conservation of water, energy, air and cultural heritage; and support an integrated approach to waste management.	
	Halton Region maintains that to accommodate its assigned portion of the GGH's population and employment growth it must expand its urban area. A preliminary review of where that expansion should occur (see <i>Sustainable Halton, Working Paper #1: Locating New Urban Land</i>) notes that the Region requires about 3,000 hectares (about 7,400 acres) of new urban lands in order to meet the targets for population and employment imposed on it by <i>Places to Grow,</i> with 1,800 hectares (4,400 acres) required for residential use, 600 hectares (1,500 acres) for employment use and 600 hectares (1,500 acres) for all other uses (schools, community centres, parks, etc.). Based on the various objectives outlined in the Province's growth plan Working Paper #1 reviews nine	Please refer to the updated land supply analysis report by Hemson Consulting Ltd.(Sustainable Halton: Accommodating Growth to 2031(Report 3.07)).
	possible urban expansion areas within Halton, each of which targets an expansion in Halton's urban area totalling 3,000 hectares. The report ultimately refines the list of nine alternatives to five, and each of the five incorporates at least some of the expansion within Milton. The Region has not yet made a decision on which alternatives ought to be pursued. It is seeking input from the community on this matter. All Regions and Counties throughout the GGH are expected to file plans with the Province in 2009 that bring them into	

Source	SUBMISSION	Response
Source	Compliance with <i>Places to Grow.</i> It is useful here to note that Working Paper #1 makes the following observation: **Potential for goods movement related employment uses has been identified around the CN Rail corridor in south west Milton. This potential needs to be recognized and considered in planning for new employment lands in the Region; however, the timing and nature of development proposals in this area has not yet been determined. **Goods movement or logistics uses in this area would be compatible with surrounding land uses and take advantage of the rail corridor for goods movement. However, these lands are less attractive than the Highway 401 area to many other types of employment uses. Yet Working Paper #1 fails to include the CN lands in any one of its five recommended alternatives for urban area expansions. Based on a variety of criteria and considerations, the following section of this report supports the view that CN's rail served lands should be included in the Region's plans for urban area employment lands expansion. **SECTION 5** WHY INCLUDE CN'S LANDS IN HALTON'S URBAN AREA EXPANSION?* This section of the report provides support for the view that CN's rail served lands should be included in the Region's plans for urban area employment lands expansion. **RAIL SUPPORTIVE INDUSTRIAL DEVELOPMENT DOES NOT MEAN INTERMODAL FACILITIES** Rail supported industrial development predominantly covers two types of economic activity: (1) manufacturing/processing activities whereby materials/components are transported to a plant by rail, and finished products are moved to various markets also by rail; and (2) logistics/distribution activities whereby goods are brought to the site by rail, and then redistributed to local markets by rail or truck. To operate efficiently such industries require sites directly served by rail.	Response See previous responses. [A]
	plant by rail, and finished products are moved to various markets also by rail; and (2) logistics/distribution activities whereby goods are brought to the site by rail, and then redistributed to local markets by rail or truck. To operate	

SUBMISSION Some industries rely on intermodal transportation for the movement of goods. This involves the movement of containers to/from their site to a nearby intermodal terminal where the containers are loaded/unloaded on/off trains. Such movement is not direct rail and does not require industrial sites with rail access. As a result the local mode of transportation at such sites is guaranteed to be made by truck. It is only with direct	RESPONSE
movement of goods. This involves the movement of containers to/from their site to a nearby intermodal terminal where the containers are loaded/unloaded on/off trains. Such movement is not direct rail and does not require industrial sites with rail access. As a result the local mode of transportation at such sites is guaranteed to be made by truck. It is only with direct	
rail access that local truck transportation can be reduced or even eliminated.	
CN's Milton lands are ideally suited for direct rail service. As a result, CN intends to optimize such use by attracting and serving direct rail customers such as manufacturers and logistics/distribution centres. CN does not intend to construct an intermodal facility in Milton; rather its intermodal services will continue to be provided out of their terminal in Brampton.	
The logistics and manufacturing activities described here represent the types of industries already present on Milton's rail served lands. An increase in the Town's capacity to accommodate more of such activities in the future is consistent with ongoing industry trends and with the Region's and Town's objectives of broadening the range of employment land choices.	
THE USE OF RAIL TRANSPORTATION FOR THE MOVEMENT OF GOODS IS ON THE RISE Trade between North America and Asia is on the rise, and rail transporters have benefited significantly from this growth. Goods are now moving over longer distances than before. Dynamic logistics systems have emerged to support the multiple transportation movements implied by these trends. Consolidations in forest, metal and chemical products have led to larger players, a trend that has also fostered longer distances in the movement of goods. These longer distances help rail compete with trucks.	
Rail used to be challenged in providing quality and timely transportation, but that is no longer the case thanks to new logistics and "precision railroading" which has led to increased efficiencies in the use of rail infrastructure, including cars, locomotives, yards and trains. Specific rail trip plans are now measured in terms of hours, not days. As a result of rail's unique agreements with both U.S. and Canadian cross border security agencies, its ability to electronically transmit in advance cargo information for both U.S. and Canada bound traffic, and its capacity to "gamma ray" screen 100 percent of all cargo destined to the U.S., rail is especially efficient in moving freight across Canada-US border points. This is an important consideration from a GTA+H perspective as much of the area's production is US bound. For example, from mid-	
e Chiskay Thradak <i>M</i> ittiCEnCtidh Filikeknusatianiitl2	even eliminated. CN's Milton lands are ideally suited for direct rail service. As a esult, CN intends to optimize such use by attracting and erving direct rail customers such as manufacturers and orgistics/distribution centres. CN does not intend to construct in intermodal facility in Milton; rather its intermodal services will continue to be provided out of their terminal in Brampton. The logistics and manufacturing activities described here expresent the types of industries already present on Milton's ail served lands. An increase in the Town's capacity to incommodate more of such activities in the future is consistent with ongoing industry trends and with the Region's and Town's objectives of broadening the range of employment and choices. THE USE OF RAIL TRANSPORTATION FOR THE MOVEMENT OF GOODS IS ON THE RISE. Trade between North America and Asia is on the rise, and rail transporters have benefited significantly from this growth. Goods are now moving over longer distances than before. Dynamic logistics systems have emerged to support the nultiple transportation movements implied by these trends. Consolidations in forest, metal and chemical products have led to larger players, a trend that has also fostered longer listances in the movement of goods. These longer distances welp rail compete with trucks. Rail used to be challenged in providing quality and timely transportation, but that is no longer the case thanks to new positics and "precision railroading" which has led to increased efficiencies in the use of rail infrastructure, including cars, occomotives, yards and trains. Specific rail trip plans are now neasured in terms of hours, not days. As a result of rail's includence agreements with both U.S. and Canadian cross border recurity agencies, its ability to electronically transmit in divance cargo information for both U.S. and Canadian cross border recurity agencies its ability to electronically transmit in divance cargo information for both U.S. and Canada bound raffic, and its capacity to "gamma

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Source	SUBMISSION	Response
	traffic in containers or trailers. Of that total, over 60 percent involves traffic moving across the Canada/U.S. border, with	
	the rest dominated by Canadian domestic traffic.	
	The CN lands provide the Town and Region with a unique and	
	significant opportunity to capture the benefits of these national	
	trends, to attract more rail users to the area – such as Whirlpool, Recochem and others already in the community –	
	that make extensive use of rail both in terms of their receipt of raw materials and parts and their shipment of final products.	
	raw materials and parts and their shipment of iliai products.	
	CN'S LANDS PROVIDE OPPORTUNITIES TO EXPAND RAIL-SUPPORTED INDUSTRIAL DEVELOPMENT	
	There is a growing interest throughout the GTA+H for	
	employment lands that are rail supportive. Camco apparently attempted to acquire a rail-serviced distribution site in Milton in	
	2004 but was unable to do so because the number of rail	
	serviceable sites in Milton is limited. As a result Camco chose to locate, instead, in Brantford. The top three employers in	
	Milton (Modatek, Karmax and Sobeys) occupy rail serviced	
	lands. Increasing the number of rail serviceable and associated business park sites would broaden the range of	
	economic development opportunities available to the Town.	
	The CN lands provide a significant opportunity for the Town	
	and the Region to expand its base of rail serviceable industrial parcels.	
	RAIL SUPPORTED INDUSTRIAL DEVELOPMENT IS CONSISTENT WITH THE PROVINCE'S GOALS	
	Rail consumes one fifth to one quarter of the fuel consumed by trucks per ton of goods moved. This is the case over both	
	short and long distances. Within Canada rail moves well over	
	50 percent of all surface freight yet generates only 3 percent of transportation greenhouse gas emissions. Thus increased rail	
	use has the potential to significantly reduce both fuel	
	consumption and greenhouse gas emissions. Increased rail use also has the potential to significantly reduce congestion on	
	highways in urban areas, and to reduce emissions in urban	
	environments.	
	These are obviously laudable outcomes from a national, provincial and urban perspective. The CN lands offer the	
	Province and the Region a unique opportunity to expand the	
	use of rail in the movement of goods in the GTA+H.	
	THE TOWN OF MILTON IS ALREADY VIEWED AS A	
	MAJOR MANUFACTURING CENTRE IN THE GTA+H It was noted above that the Town of Milton is one of the few	
	municipalities within the GTA and Hamilton to have achieved manufacturing job growth in general, or transportation	
	equipment job growth in particular, between 2001 and 2006.	
	The Town is already viewed as a major manufacturing centre within the GTA+H (Milton ranked 13th out of 26 in 2006 in	
	within the OTATH (Willtott fathled Tottl Out Of 20 III 2000 III	

Source	SUBMISSION	Response
	terms of total employment in manufacturing by place of work, 9th out of 26 in terms of total transportation equipment manufacturing employment, and 5th out of 26 in terms of manufacturing employment relative growth between 2001 and 2006, the latter over a period when manufacturing jobs in Ontario and the GTA+H declined).	
	Milton's revealed attractiveness as a location for manufacturers, especially manufacturers requiring rail support, ensures that the CN lands could be developed within a short time of their being made available for such purposes.	
	CN'S LANDS PROVIDE OPPORTUNITIES TO GROW LIVE-WORK RELATIONSHIPS IN THE REGION Most future employment land development within Milton is slated for the northern part of the Town, along Highway 401. Local economic development officials point out that these lands are especially attractive to low-rise office development. These parcels of land have become increasingly expensive as a result of this attractiveness. The increased cost of these lands has rendered them less attractive for industrial purposes.	
	Most of the population growth in Halton is slated for north Oakville, south Milton and north Burlington, and most of the new urban expansion proposals for the Region foresee at least some of the population growth beyond that already planned occurring in Milton. Most of Milton's future population growth is slated to grow south to Britannia Road, just north of the CN lands.	
	Given this heavy concentration of population growth in south Milton, north Burlington and north Oakville, the CN lands are strategically situated in the middle of the portion of the Region slated to accommodate most its future population growth.	
	In other words, the CN lands are uniquely positioned to foster new live-work relationships within the Region. At the densities sought by the Province, the area in question could attract upwards of 10,000 to 15,000 new jobs. The Province's <i>Places to Grow</i> specifically seeks transit supportive densities and a healthy mix of residential and employment land uses. Halton needs job growth of both an economic base and a community base nature close to its population growth to achieve these objectives. The CN lands provide such an opportunity.	
	CN'S LANDS PROVIDE OPPORTUNITIES TO SUPPORT "GREEN" INDUSTRIAL DEVELOPMENT The Town of Milton and Wilfrid Laurier University recently reached an agreement for the development of a new campus immediately west of Tremaine Road and north of Britannia Road, just northwest of the CN lands. The proposed Milton Education Village (MEV) is to accommodate a 150 acre (60 hectare) campus and 300 acre (120 hectare) research park	

Source	SUBMISSION	Response
	and supporting development.	
	The MEV is to be a strong, livable and environmentally responsible community that incorporates the latest technology; that fosters a culture of creativity and innovation; that attracts new businesses to Milton; that promotes partnerships with industry to support the growth of innovative companies; that provides leadership in developing "green" buildings and in using renewable energy sources; and that creates a transit supportive environment.	
	The development of CN's lands for rail supportive, "green" purposes could provide the proposed university and its associated research facilities with research synergies. CN's surplus or buffer lands in the immediate vicinity of the MEV might be considered as a location for the proposed research park.	As indicated previously, 200 hectares of employment have been identified in south Milton along Tremaine Road, adjacent to the rail line, immediately south of the Milton Educational Village.
	THE PROPOSED INDUSTRIAL USES ARE CONSISTENT WITH THE PROFILE OF MILTON'S LABOUR FORCE The 2006 Census revealed that among communities with populations of 50,000 people or more the Town of Milton ranks 7th in terms of its share of the resident population aged 20 to 64 years with a post secondary level of educational attainment. Milton's share was 66.6 percent. Interestingly, nearby Oakville ranked 1st in this regard at 74.3 percent while Burlington ranked 5th at 68.3 percent. The average household incomes in all three municipalities are among the highest in the country (Milton at \$98,025, Oakville at \$126,750 and Burlington at \$95,950) reflecting this highly educated labour force profile.	
	The industries sought out for the future development of CN's lands in Milton run facilities that are highly capital intensive and that require personnel with post secondary skills. Thus the development of these lands would attract the type of workers already living, or expected to be living in the future, in Milton, Burlington and Oakville, thus facilitating the expansion of livework relationships in the Region, reducing highway congestion, etc.	
	MORE INDUSTRIAL CAPACITY MEANS MORE DEVELOPMENT CHARGES AND MORE PROPERTY TAXES The proposed development lands bounded by Tremaine Road (west), Britannia Road (north), First Line (east) and Lower Base Line Road (south) cover approximately 357 hectares. It is proposed by CN that approximately 220 fully developed hectares of this area will be available for direct rail service and the remainder for associated business park purposes.	
	The industrial and commercial development on these lands could lead to development charges totalling almost \$200 million, and to annual industrial and commercial property taxes	

Source	Submission	Response
	totalling \$25 million. These revenues would help the Region and Town expand the range of service and infrastructure opportunities provided to the community.	
	SECTION 6 CONCLUSIONS This assessment draws attention to the following points:	
	 Direct rail service is becoming increasingly important for the future movement of goods to and from employment lands. To enhance its prospects of attracting industries 	
	Milton needs to ensure that it has an ample inventory of rail served employment lands as well as highway frontage lands. CN's lands afford Milton with the best opportunity for attracting rail supportive industries.	
	 CN's lands offer other location advantages to Milton, Halton and Ontario: With most future population growth within the Region slated to occur nearby, the CN lands 	
	provide the Region with a unique opportunity to foster future live-work relationships. The lands are readily serviceable. The lands have ready access to Highway 407, the James Snow Parkway and Highway 401.	
	The lands offer potential synergies with the Milton Education Village via the establishment of research park elements on CN's surplus or buffer lands, in demonstrating the latest technology in "green buildings" and in the use of renewable energy	
	sources (particularly rooftop solar). The types of businesses that would be attracted to the CN lands will also attract highly skilled workers to the area.	
	 Use of these lands will foster more rail and less truck usage in the area which, in turn, will reduce traffic congestion and the emission of greenhouse gases in the vicinity. As these lands represent a net new addition to 	
	employment lands in the area they will produce new development charges that would cover the costs on any related infrastructure, and they will generate new commercial and industrial taxes, thus keeping residential property taxes in check.	
	If Milton is to preserve its current activity rate of a total of 459 jobs per 1,000 residents into the future – a stated objective of the Town – and if the Region ultimately targets a population of 250,000 people for Milton in 2031, the number of jobs in Milton	
	will have to increase from 24,750 in 2006 to 115,000 in 2031, an increase of 90,000 between 2006 and 2031. The Region's 2007 Best Planning Estimates foresee Milton's employment base increasing to 71,000 by 2021, well short of our estimate	

Source	SUBMISSION	Response
	here for 2031. This report demonstrates that Milton will need to accommodate thousands and thousands of new jobs between now and 2031 if Halton Region is to fully comply with the Province's growth plan, and that for many reasons CN's lands in Milton provide the Region with a unique ability to reach many of the Province's growth plan goals. Supporting technical reports: 1. CN South Milton Industrial Precinct Transportation Considerations – BA Consulting Group (September 2008) 2. A Planning Rationale in Support of Development of a Direct Rail Service Industrial Park – Bousfields Inc. (September 12, 2008) 3. Functional Servicing Report – Sernas Associates	Response to Technical Report - Functional Servicing Report: The purpose of this report is to identify the preliminary servicing requirements for the CN Railway lands in southwest Milton. Generally, the conclusions of this report are sound in that there are feasible servicing options for these lands. If these lands are included in the preferred growth option for Sustainable Halton, then the Halton Water and Wastewater Master Plan will identify a servicing strategy for servicing these lands. Response to Technical Report – CN South Milton Industrial Precinct Transportation Considerations: Upon review of this report, Regional staff note that the report must have a phasing plan and identify when all road improvements are required. The report also needs to provide analysis on the access requirements for the development. As part of the site development process a formal Traffic Impact Study will be required.
Niagara Escarpment Commission (NEC) September 18, 2008 / September 24, 2008	RE: Sustainable Halton Evaluation Framework and Five Growth Concepts This is to respond to your letter of August 20, 2008 inviting the Niagara Escarpment Commission to respond to "The Sustainable Halton Evaluation Framework and the Five Growth Concepts". The Niagara Escarpment Commission (NEC) considered the request at its meeting of September 18, 2008, and has the following comments on these aspects of the Sustainable Plan:	

Source	SUBMISSION	Response
	1. The growth concepts, in and of themselves, are not an issue because all five cover land outside the Niagara Escarpment Plan (NEP). Although the concept areas may not impact the NEP, broader issues related to urban intensification and growth for these lands will likely involve services, new roads, transit, infrastructure and parks/open space that have an affect on the NEP. For example, roads may cross the NEP or be proposed for widening, or new reservoirs and water lines may be needed. Additionally, lands nearby or adjacent to the NEP may have to be assessed for visual impact and buffering (depending on what Concept Area is selected). The scale and design of the future Milton Education Village near the edge of the NEP is an example. However, these issues are matters that can be looked at more closely later in the Plan development process or as part of the eventual implementation scheme associated with the Sustainable Plan. 2. The Themes, within the Evaluation Framework, are relatively broad in nature and these are intended to provide direction to the future Official Plan policy and land use. These have been used in helping develop the growth concepts. The NEC is generally supportive of the Themes and the emphasis on protecting what is valuable and developing healthy and complete communities. 3. One Theme that, from the NEC perspective, requires clarification is Theme 1.4 respecting mineral resource areas. The focus here seems to be on protection of surrounding uses from aggregate extraction including encroachments and new development. Agricultural lands are also to be prioritized for protection, and extraction supported as an interim use in such areas. Missing is reference to similar direction for lands which are environmentally sensitive or could form part of the enhanced Natural Heritage System. Rehabilitation of such lands is also important where such lands are logical candidates for a return to a previous natural condition or can be used for parks and open space opportunity once mining is complete. The	Comments on potential impacts to Niagara Escarpment Plan area have been duly noted by Regional staff. The Region's report Aggregate Resource Management in the Region of Halton, Part 2 – Establishing a Policy Framework (Report 3.05) addresses the relationship between aggregate extraction and the natural environment. Through the five year Official Plan Review process, the Region will develop policies that recognize the need to ensure that the consideration of how natural heritage systems and groundwater and surface water features can be enhanced prior to (if feasible), during and following extraction.

Source	SUBMISSION	Response
	A copy of the Staff Report considered by the NEC is enclosed.	
	September 18, 2008	
	Staff Report RE: Sustainable Halton – Evaluation Framework and the Refined Growth Concepts – The First Principles Date Circulated: June 25, 2008 and August 25, 2008 Comment Deadline: September 22, 2008 Summary Recommendation: No Objection	
	Background:	
	Shortly after the approval of the Regional Official Plan in 2006, the Region began to work on developing its "Sustainable Plan". The Sustainable Plan is intended to set out a longer vision and strategy to address the resource pressures facing Halton including protection of the environment, agriculture, and population growth.	
	The Plan produced in 2006 was generally seen as a refinement of the existing Official Plan proposing an updating rather than a substantive change in direction. For example, the existing urban boundaries remained generally unchanged. As part of the settlement with landowners/the development industry, the Region agreed to start a review of the approved urban boundaries and resource policies (i.e. aggregate extraction) following approval of the 2006 plan.	
	An additional driver is related to recent provincial initiatives relating to the 2006 Growth Plan, the 2005 Greenbelt plan (of which the NEP is a part) and the 2005 Provincial Policy Statement.	
	A number of background papers were prepared over a period of time to set out options and issues for the Sustainable Plan. These were used for agency discussion and public input at the initial stages of the process. The matters circulated to the NEC involve the Evaluation Framework and the Concepts for identifying growth and intensification areas.	
	Comment:	
	The Niagara Escarpment Commission (NEC) staff have been part of the Committees dealing with various aspects of the evolving Sustainable Plan. Of note there is a special Committee on aggregate extraction, which is always of interest to the NEC program.	
	The NEC has been asked to comment on what can be viewed as "first principles" now that the Region Council has approved	

Source	SUBMISSION	Response
	the Evaluation Framework and Five Growth Concepts, for agency comment. A threshold issue does relate to the Five Growth Concepts, since it sets out the areas within the Region that will be subject to intensification and growth. Urban boundaries will be changing to accommodate future population which is mandated by the Growth Plan and Provincial policy.	
	From the NEC perspective the growth concepts, in and of themselves, are not an issues because all five cover the lands outside the Niagara Escarpment Plan (NEP). Although the concept areas may not impact the NEP, broader issues related to urban intensification and growth for these lands will likely involve services, new roads, transit, infrastructure and parks/open space that have an affect on the NEP. For example roads may cross the NEP or be proposed for widening, or new reservoirs and water lines may be needed. Additionally, lands nearby of adjacent to the NEP may have to be assessed for visual impact and buffering (depending on what Concept Area is selected). The scale and design of the future Milton Education Village near the edge of the NEP is an example. However, these issues are matters that can be looked at more closely later in the Plan development process or as part of the eventual implementation of the Sustainable Plan.	See first response of the submission.
	The Themes within the Evaluation Framework are relatively broad in nature and these are intended to provide direction to the future Official Plan policy and land use. These have been used in helping develop the growth concepts. Staff are supportive of the Themes and the emphasis on protecting what is valuable, and developing healthy and complete communities.	
	One Theme that, from the NEC perspective, requires clarification is Theme 1.4 respecting mineral resource areas. The focus here seems to be on protection of surrounding uses from aggregate extraction including encroachments and new development. Agricultural lands are also to be prioritized for protection, and extraction supported as an interim use in such areas. Missing is reference to similar direction for lands which are environmental sensitive or could form part of the enhanced Natural Heritage System. Rehabilitation of such lands is also important where such lands are logical candidates for a return to a previous natural condition or can be used for park and open space opportunity once mining is complete. The NEC's long-standing concern that mineral resource areas (e.g. shale) be utilized before they are built over would be covered under the general statement in the Theme that says, "minimize encroachment of development onto mineral resource areas".	See second response of the submission.
	Recommendation: That the Niagara Escarpment Commission endorse the	
	Evaluation Framework and Five Growth Concepts circulated to	

Source	SUBMISSION	Response
	the Commission, subject to the comments/suggestions set out in this report. The Commission will provide additional comments on other aspects of the proposed Halton Sustainable Plan as the planning process proceeds (e.g., mineral aggregate	
Conservation Halton	Re: Sustainable Halton Evaluation Framework and Five Growth	
September 22, 2008	Concepts Working Paper #1 CH File: MPR 404	
	Staff of Conservation Halton have reviewed the Sustainable Halton Working Paper #1 (Locating New Urban Land) and the Growth Management Strategy Evaluation Framework, both prepared by the Region and Urban Strategies Inc., dated March 2008, and offer the following comments.	
	The purpose of Working Paper #1 is to establish principles on where new urban lands might be located. As stated in the paper, the concepts do not include assumptions around the form or density of development. These issues will be addressed in the next stage of work. With respect to the natural heritage system, staff understand that Regional Council has adopted Option 3 (Enhanced Ecological Integrity). Staff are very supportive of this option and commend the Region for having the foresight and vision to protect, and hopefully enhance, the long-term ecological function and biodiversity of the natural heritage system as per the	The Region will be implementing an enhanced Natural Heritage System.
	requirements of the Provincial Policy Statement. The paper notes that the Study Team is refining the limits of the NHS and that the mapping will be updated in the next phase of work. Staff look forward to reviewing the updated mapping as it becomes available and would be pleased to meet with the Region to discuss any of the refinements prior to finalization.	The mapping is available in <i>Report</i> 3.02: Sustainable Halton Natural Heritage System Definition and Implementation by North-South Environmental.
	The Working Paper (page 10) also notes that it has been assumed that new urban areas will be served by lake-based water in Halton. This is important when reviewing the alternative growth scenarios as it has significant implications on servicing costs.	
	Figure 3 – Nodes and Corridors – staff question whether it is appropriate to show the existing alignment of Tremaine Road as a potential mixed-use corridor. Given that the realigned Tremaine Road will likely be more heavily utilized, it would seem appropriate to highlight that realigned road as a potential mixed-use corridor. By doing so, this would also remove Steeles Avenue from the mixed-use corridor designation.	Through consultation with the Sustainable Halton Working Group (comprised of Regional Staff, Local Municipal Planning Staff, Public Agencies and the Province), it was determined that corridors would not be illustrated on the refined Growth

Source	Subm	ISSION	Response
		eles Avenue to the Niagara buld seem appropriate not to se corridor.	Concepts.
	of Sixteen Mile Creek is mis Creek while the east branc mistakenly referred to as the	nout the paper the main branch takenly referred to as Bronte h of Sixteen Mile Creek is main branch of Sixteen Mile d in any subsequent papers to s of the land areas.	Errors were noted and corrected on the final version of Working Paper #1.
	Refined Concepts		
	Following a review of nine altern Team has narrowed the concep Centred; (2a and b) Milton-Geo Milton Georgetown (High). All proposed post-secondary institu Road and north of Britannia Rol lands in Milton and Halton Hills corridor.	ots down to five: (1) Milton rgetown (Low); and, (3a and b) scenarios include: the utional use west of Tremaine ad; and, additional employment	
	Based on our review of the alternative scenarios, it would appear that Concepts 1 and 3b both have positive attributes associated with maintaining and enhancing the Natural Heritage System. Our comments and conclusions are based on the same assumptions that are made within the Working Paper. This includes the assumption that servicing will be provided with a lake based system. If groundwater would be used to service an expanded Georgetown urban boundary, staff would need to reconsider our preferred alternative selection process.		Comments noted.
	The benefits and drawbacks of opinion, are outlined below:	these two concepts, in our	
	Concept 1: Milton	Centred Expansion	
	Benefits Headwaters of Sixteen Mile Creek remain relatively undeveloped. This will assist in maintaining the natural hydrologic regime.	Drawbacks Market gardens close to urban areas may be beneficial and could supply the urban areas with local produce. This concept would remove market gardens east of Trafalgar Road.	The benefits and drawbacks provided for Concepts 1 and 3b have been considered by the Sustainable Halton Working Group in refining the Growth Concepts.
	Focusing development south of Highway 401 may lessen the need for additional major transportation routes north of Highway 401 (GTA West Corridor). No need for additional water	Urban development surrounding the NHS south of Highway 401 could result in pressure to reduce the size of the NHS to accommodate intense development along Trafalgar Road. This concept will likely result in	With respect to the impact that urban development along Trafalgar Road could have on the Natural Heritage System, the NHS has undergone a number of refinements (as described in <i>Report 3.02, Sustainable Halton</i>
	supply to Georgetown thereby	the need to upgrade	Natural Heritage System Definitions and Implementation report prepared

Source	SUBMISSION		Response
JOURGE		(widen/expand) north-south roads	-
	decreasing the cost of servicing lands north of Highway 401.	such as 5th Line, 6th Line and Trafalgar Road and east-west roads such as Lower Baseline Road. These mainly rural roads currently travel through or adjacent to significant valleys associated with Sixteen Mile Creek. This concept could have significant impacts to these valley systems should these roads need to be upgraded in the future.	by North-South Environmental), including the relocation of the Regional Centre of Biodiversity along the east side of Trafalgar Road, south of Britannia Road, in recognition of Trafalgar Road as an important mixed-use corridor.
	No services north of Highway 401 will mean less pressure in the future to expand urban boundaries along the service lines (i.e., along Trafalgar Road where the services would likely be located).	It is unknown, at this time, how many crossings of the NHS will be required to access the lands between Trafalgar Road and 8th Line. It is likely that Drumquin Woods ESA would be significantly impacted by a midblock arterial road (based on the assumption that a road would not go through Piper's Heath Golf Course).	
	The ultimate removal of the market gardens east of Trafalgar Road will likely have a positive impact on Sixteen Mile Creek by decreasing water taking for irrigation purposes.	·	
	Focusing development south of Highway 401 will likely make the proposed new GO Station in Milton more viable, as well as the transitway along Highway 407, thereby potentially getting more commuters out of their cars and into mass transit.		
	By surrounding the NHS with development south of Highway 401 there is a greater likelihood of getting these features into public ownership, and protected in perpetuity. Focusing development south of		
	Highway 401 will leave agricultural lands largely intact north of Highway 401. Concept 3b: Milton-	Georgetown (High)	
	Benefits Headwaters of Sixteen Mile Creek remain relatively undeveloped. This will assist in maintaining the natural hydrologic regime.	Drawbacks Market gardens close to urban areas may be beneficial and could supply the urban areas with local produce. This concept would remove market gardens east of Trafalgar Road.	

Source	Submis	SSION	Response
	Focusing development south of Highway 401 may lessen the need for additional major transportation routes north of Highway 401 (GTA West Corridor). No need for additional water supply to Georgetown thereby decreasing the cost of servicing lands north of Highway 401.	Urban development surrounding the NHS south of Highway 401 could result in pressure to reduce the size of the NHS to accommodate intense development along Trafalgar Road. This concept will likely result in the need to upgrade (widen/expand) north-south roads such as 5th Line, 6th Line and Trafalgar Road and east-west roads such as Lower Baseline Road. These mainly rural roads currently travel through or adjacent to significant valleys associated with Sixteen Mile Creek. This concept could have significant impacts to these valley systems should these roads need to be upgraded in the future.	
	No services north of Highway 401 will mean less pressure in the future to expand urban boundaries along the service lines (i.e., along Trafalgar Road where the services would likely be located).	It is unknown, at this time, how many crossings of the NHS will be required to access the lands between Trafalgar Road and 8 th Line. It is likely that Drumquin Woods ESA would be significantly impacted by a midblock arterial road (based on the assumption that a road would not go through Piper's Heath Golf Course).	
	The ultimate removal of the market gardens east of Trafalgar Road will likely have a positive impact on Sixteen Mile Creek by decreasing water taking for irrigation purposes. Focusing development south of Highway 401 will likely make the proposed new GO Station in Milton more viable, as well as the transitway along Highway 407, thereby potentially getting more commuters out of their cars and into mass transit. By surrounding the NHS with development south of Highway 401 there is a greater likelihood of getting these features into public ownership, and protected in perpetuity. Focusing development south of Highway 401 will leave agricultural lands largely intact north of Highway 401.	Course).	
	Staff recommend that Option 3b	would benefit from some	The location of the proposed mixed-

Source	SUBMISSION	Response
	minor boundary adjustments, specifically associated with the urban boundary expansion in Georgetown. Please see the enclosed modified Concept plan for our recommendation. We also note that Option 3b contains new urban areas within the CVC's watershed. Additional comments will be provided by the CVC based on their review. Based on the above, staff recommend that there are certainly benefits and drawbacks with each of the five concepts. We have attempted to outline the benefits and drawbacks of the two alternatives that we perceive to be the best from a natural heritage perspective as well as a land use planning perspective. We would like to request a meeting with the Region of Halton and the CVC to discuss the five options prior to the Region beginning the next phase of this project.	use/residential development is shown conceptually on the refined Growth Concepts. Specific locations for development will be determined once a preferred growth option is selected, in close consultation with the respective local municipality.
Canadian Pacific	Subject: Canadian Pacific Railway Comments to Sustainable Halton	
September 26, 2008	To the Sustainable Halton Project Team, I attended your September 16, 2008 open house on the Sustainable Halton Growth Management Strategy and would like to offer the following feedback to your September PIC Workbook from a Canadian Pacific Railway (CP) point of view. First of all, I notice that all of the potential employment lands straddle the Highway 401 corridor and are impossible or very difficult to serve directly by rail. Crossing Highway 401 with rail would be uneconomical and accessing the potential employment lands immediately south of Highway 401 is complicated by the Hydro corridor and existing built up industries. It is CP's view that the intent of Places to Grow is to have future flexibility for access to multimodal transportation options, especially for employment lands and related goods movement. Another alternative which could be considered to achieve this goal would be to relocate some of the potential employment lands from north of Steeles Ave to a location immediately south of the railway and east of Trafalgar Road. In this location, the potential employment lands would have similar access to the 400 series highways with interchanges at Derry Road and Highway 407 as well as Trafalgar Road and Highway 401. The added benefit would be the flexibility to have direct rail access if the future businesses required this.	Through the Sustainable Halton process, the Highway 401 corridor has been identified as a significant location for employment as it is a preferred trucking route, and the surrounding lands have good access to Highway 401 and benefit from strong connections to existing employment areas. Hemson Consulting Ltd has completed an updated land supply analysis which has increased the employment land needs to a total of 1,100 hectares. The detailed land supply analysis can be found in Report 3.07 Sustainable Halton: Accommodating Growth to 2031. In addition to lands along the Highway 401 corridor, proposed employment lands have also been identified along Highway 407 in east Milton, north of Highway 401 (along the future James Snow Parkway), and straddling Tremaine Road immediately south of the Milton urban area (see Working

Source	Submission	Response	
	Secondly, I notice that 3 of the 5 land use concepts being considered have mixed use residential in close proximity or on CP lands east of Trafalgar Road. Over the past five years, a joint committee comprised of members of the Federation of Canadian Municipalities and the Railway Association of Canada have worked together to improve municipal planning, develop new techniques for mitigating noise and vibrations, and further enhance public safety around railway operations. The partnership also published the first comprehensive Proximity Guidelines and Best Management Practices for new residential developments in proximity of rail operations. Copies of this report can be provided upon request. The committee's website of www.proximityissues.ca can also be accessed for further information.	Paper #2: Concepts for Addressing Halton Region's Land Needs to 2031(Report 3.08)). Through the Sustainable Halton process, the lands immediately south of the potential GO Transit Station in east Milton have been identified as a significant potential location for mixed-use/residential development to support and encourage transit use. We thank Canadian Pacific for the reference to the Proximity Guidelines and Best Management Practices report which staff have reviewed. Land use compatibility has been discussed in Report 3.11: Connecting Sustainability in Halton RegionFrom Policy to Practise, one of a series of reports recently prepared for Sustainable Halton. Staff also note that detailed land use compatibility issues will be dealt with through future planning processes.	
	Lastly, I notice that a GO Transit rail station is proposed just east of Trafalgar Road. I would like to point out that there is a new GO Transit rail station less than 2 miles east of this location. I am pleased to have the opportunity to provide this input to your study. If you wish to discuss this further, I would be happy to meet with you. Regards, Area Manager Corporate Business Development Canadian Pacific	The proposed GO Transit Station in east Milton is shown conceptually and could be situated in a more easterly location.	
Private Organization Comments			
Halton Hills Chamber of Commerce White Paper on Refined Concepts for Employment Lands	Abstract Under the Sustainable Halton Planning project, a series of studies have been completed to help guide Halton Region in preparing a new growth management strategy. The Region has released Working Paper #1: Locating New Urban Land that presents various arguments and scenarios for growth options designed to assist Halton Hills and Milton councils and citizens in focusing on an option that will guide growth for the next couple of decades. The Halton Hills Chamber of		

Source	SUBMISSION	Response
July 30, 2008	Commerce has an obligation to comment on the Refined Concepts with regards to employment lands that were derived from nine primary concepts. All Refined Concepts, 2(a), 2(b) 3(a) and 3 (b) accommodate new employment lands in Halton Hills within a strip of land along Steeles Avenue on its north side from a point in Hornby to Winston Churchill Boulevard. The consistency of the Refined Concepts strongly suggest that Halton Hills will have additional lands designated as employment lands in the preferred option to accommodate growth. It is important to support a concept for proposed employment lands north of Steeles Avenue and to suggest to the Region that there may be an option to extend the Steeles Avenue designations in the Bramwest Secondary Plan, and take advantage of the Peel North South Corridor and Bramwest Parkway. The Parkway may become a connecting link between the province's proposed new east west arterial roadway and the Highways 401 and 407. The Winston Churchill/Steeles Avenue/401 node requires continued study to best develop proposed employment lands in this area to take advantage of a future transportation corridor. Refined Concepts 2a and 2b may also stimulate the development of the GO Station in Georgetown, and the historical downtown core of Georgetown in association within the larger context of a GO train expansion from Georgetown to Guelph and Kitchener-Waterloo.	
	Discussion There appears to be an emerging preference in Halton Hills for either Concept 2a or 2b under a growth option that would see an additional 20,000 residents in Halton Hills. Both options would see the urban boundaries of the Georgetown Area extended to accommodate residential growth. The growth of Halton Hills by 20,000 residents would have a less radical impact than Concept 3a or 3b which suggests growth of 40,000 residents. Each of the refined concepts accommodates 600 hectares of employment land in Halton Hills and Milton centred on the highway 401 corridor. These concepts also allow for the continued preservation of rural lands for agricultural and agri-business purposes. The Halton Hills Chamber of Commerce agrees that Halton Hills must accommodate growth within the context of the Sustainable Halton plan, but that the pace of growth and place for new employment lands and new residential development needs to be managed in a way that compliments the character and qualities that make up this community. Appropriate mechanisms must also be put in place to monitor the pace of growth and ensure continued compliance to the principles supporting the growth objectives. Although we don't expect development, as outlined in the Sustainable Halton plan, to commence for at least 12 – 15 years, prudent planning now is required to ensure that the values that the residents and businesses of our community wish to endure are built into the	The location of the proposed mixed-use/residential development is shown conceptually on the refined Growth Concepts (see Sustainable Halton Report 3.08: Working Paper #2: Concepts for Addressing Halton Region's Land Needs to 2031, by Urban Strategies Inc.). Specific locations for development in Halton Hills will be determined in close consultation with the Town of Halton Hills staff.

Source	SUBMISSION	Response
	"Working paper #1: Locating New Urban Land," notes in concepts indicating new employment land in the vicinity of the Winston Churchill Boulevard and Steeles Avenue intersection that development may be constrained by proposals for a new	The Region, in collaboration with the Local Municipalities, will be establishing a process for measuring and monitoring in order to achieve the targets in the Provincial Growth Plan. The Region is very much aware of the proposed Halton Peel Boundary Area Transportation Study. As the
	highway in this area. The scope of the working paper did not reference the Bramwest Secondary Plan and the plans for a North South Corridor and Bramwest Parkway, including a crossing of the Credit River with a new bridge. The Corridor and Bramwest Parkway appears to pass through the proposed employment lands in the northwest quadrant of Steeles Avenue and Winston Churchill Boulevard to intersect with Highway 401.	preferred alignment is not known at this time, the refined Growth Concepts do not reflect the proposed transportation corridor. Once the preferred alignment is known, its location will be reflected.
	Considering that the Bramwest Secondary Plan includes employment lands (business park and prestige industrial), in proximity to the employment land areas suggested in Concepts 2a and 2b and a parkway, there may be opportunity for additional employment land designations further north of Steeles Avenue within the North South Corridor, in association with Concepts 2a and 2b.	Through an updated land supply analysis completed by Hemson Consulting Ltd., it has been determined that there is a need for 1,100 hectares of employment through Sustainable Halton. Given the amount of employment lands that have been identified, the priority locations for this employment have been determined in consultation with the Sustainable Halton Working Group (Regional staff, Local Municipalities, Public Agencies and the Province). The proposed employment lands are located along the Highway 401 corridor, north of Highway 401 along the future James Snow Parkway, along Highway 407 in east Milton, and along Tremaine Road adjacent to the CN rail line. The Region also recognizes the importance of future strategic employment post 2031 and will be incorporating policies through the five year Official Plan Review process.
	To attract business to Halton Hills, the obligation is very much that of the Town of Halton Hills, given that new development charges are set, and the Town must find ways to brand itself as a place where business is welcome and that there is value to being located in Halton Hills.	
	The Chamber of Commerce would have to rely on the planning expertise of the Region of Halton and Town of Halton Hills and their consultants to determine if extension of the	

Source	SUBMISSION	Response
	employment lands north of Steeles in association with the Bramwest Secondary Plan makes sense, and can in fact fall within the guidelines of the growth concepts.	
	Considering the Refined Concepts and the location of potential mixed use/residential development, the Chamber of Commerce identified two elements of concepts 2a and 2b. In concept 2a, residents gaining employment in Halton Hills in the new employment lands would have a shorter private automobile commute and perhaps contribute to mitigating the environmental impacts of new development and the "carbon footprint" brought on by urban growth. There may be energy cost savings associated with short commutes by automobile.	Comments noted
	In Concept 2b, there may be a greater positive impact on the use of potential employment lands around the Georgetown GO Station, and stimulation of the Georgetown historical town centre in the context of a GO extension to Guelph and Kitchener. In addition, Concept 2b may enhance the redevelopment of the GO Station lands and public transportation in light of rising energy costs and improved public transit. This is not to say that Concept 2a would contribute any less to the success of the downtown core and GO Station lands, only that close proximity of large population areas to such facilities, generally increase use.	Comments noted
	Public debate and the wise counsel of the elected representatives of Halton Hills to Halton Region will determine the best of the Refined Concepts. There is sure to be strong opinions expressed, and positions taken by the two competing developers groups for each of the growth options. In any event, it would appear that the Town of Halton Hills will get more land designated for employment uses, if it approves either concept 2a or 2b. In addition there will be employment opportunities and new businesses established in the many plazas that will be developed in either Concept 2a or 2b. Employment opportunities will be presented to existing employers, as the population of the Georgetown Area grows. The area that remains uncertain is the land around Winston Churchill Boulevard and Steeles Avenue, and perhaps north along Bramwest Parkway within the North South corridor. The type of development for the employment lands is another issue to be dealt with at another time.	
	Intensification of residential land use in Halton Hills is another element that impacts the decisions that must be made in association with Sustainable Halton. To receive its allotment of new employment lands, Halton Hills must accept expansion of its urban area in Georgetown to accommodate new residential development. In addition to this new development is the directive for intensification that will place additional demand on infrastructure requirements and services provided by the Town's staff to process the needs of existing and new businesses. While the Chamber of Commerce supports the	Halton Region has decided to take a

Source	SUBMISSION	Response
	principle of intensification to accommodate growth in existing urban areas, it does recognize that intensification is not enough to accommodate the growth needs in Sustainable Halton. It is incumbent upon businesses in Halton Hills, including agribusinesses, to engage the planning process of Sustainable Halton and work with Town of Halton Hills council and staff to attract businesses to new employment lands and existing employment facilities that can absorb the skills of Halton Hills residents to make this Town truly sustainable in many ways.	'bottom up' approach to intensification. The Region has received the Town of Halton Hills intensification estimates and this work will be incorporated into Sustainable Halton moving forward.
	Conclusion The Chamber of Commerce remains neutral on its preference of the location of potential mixed use/residential lands of Refined Concepts 2a or 2b, but recognizes that Halton Hills must increase its population at a controlled pace. It does support the location of new employment lands along the north side of Steeles Avenue from Hornby to Winston Churchill Boulevard, and would strongly endorse additional employment lands in relation to the employment lands of the Bramwest Secondary Plan and Bramwest Parkway. It would also support new employment opportunities in the new plazas of both concepts, and recognizes that approval of either of the concepts could benefit existing businesses in Halton Hills. It supports the principle of intensification to accommodate growth, but also recognizes that with intensified and new development, lake-based infrastructure is inevitable to compliment the current well-based potable water supply and sewage treatment systems of the Georgetown Area.	Comments noted.
The Manaman Group August 15, 2008	Further to Sustainable Halton Working Paper #1: Locating New Urban Land; and the Halton Developers Liaison Meeting on July 31, 2008, the Manaman Group respectively submit its comments as follows: (1) we understand CNR is proposing an intermodal/industrial park on the CN lands at Britannia Road and Tremaine Road. It appears to us that this has not been reflected in the Working Paper. As such, we are of the opinion that this intended use of the CN lands should be reflected in the Working Paper.	Through regular meetings of the Sustainable Halton Working Group (comprised of Regional and Local Municipal planning staff, and Public Agency staff), discussions have taken place regarding the potential designation of additional employment lands to 2031. Recent work completed by Hemson Consulting Ltd. concluded that based on additional information (which included previously unavailable 2006 Census data), there is a need for approximately 1,100 ha of employment. Approximately 200ha of lands in south of Milton along Tremaine Road adjacent to the rail line have been included.
	In addition, given the close proximity of the proposed	

Source	SUBMISSION	Response
	Education Village along the west side of Tremaine Road, compatible land uses in the vicinity of the CN lands, especially those lands along the west side of Tremaine Road, should also be considered at the same time.	
	(2) We are of the opinion that the Trafalgar Road Corridor should have priority over other areas in Milton since the major infrastructures are already in place. These infrastructures include the widening of Trafalgar Road to 4 lanes, all the way to Highway 401 from the south; the construction of the CPR overpass north of Derry Road; and the 2 nd water feed to Milton, the construction of which is to commence early next year.	We agree with your comments. Trafalgar Road is an important north/south corridor in Halton Region and the focus of considerable investment. Trafalgar Road forms an important element of the Growth Concepts. The refined Growth Concepts presented in Report 3.08: Working Paper #2: Concepts for Addressing Halton Region's Land Needs to 2031, by Urban Strategies Inc., include a strong focus along the Trafalgar Road corridor in Milton to make the best use of existing and planned transportation, water and wastewater infrastructure.
South Georgetown Landowners Group August 26, 2008	1.0 EXECUTIVE SUMMARY This report has been prepared on behalf of the South Georgetown Landowners Group in response to the Refined Concepts presented by the Region of Halton in Working Paper #1: Locating New Urban Land. (Report PPW42-08) The South Georgetown Landowners Group own land located in the area east of Trafalgar Road, north of the 5th Side Road, south of the 10th Side Road and west of Ninth Line (Mountainview Road) all of which is located immediately south of and adjacent to Georgetown in the Town of Halton Hills. These lands are collectively referred to as "Georgetown Commons" and are shown on Figure 1. The Georgetown Commons lands are approximately 800 hectares in area.	
	The targets set out in Places to Grow, the Growth Plan for the Greater Golden Horseshoe (2006) require Halton to plan for its 2001 population to double, from 390,000 to 780,000, and its employment to more than double, all by the year 2031. This presents a major challenge to the Region. Halton needs not only to accommodate this growth but manage it to its best advantage. Halton must accept significant additional greenfield growth to meet these targets.	
	Halton Region is uniquely positioned in the economic geography of the Greater Golden Horseshoe. Most of Ontario's main rail and expressway corridors interconnect in Halton and Peel. The close proximity of Lester B. Pearson International Airport greatly influences employment growth location and the Province's Places to Grow policy seeks to reinforce the economic importance of this Region by confirming the need for two additional transportation corridors, the Niagara-GTA Corridor (Mid-Peninsular Expressway) and the GTA West Corridor (North Halton-Peel Expressway). The	

Source	SUBMISSION	Response
SOURCE	need for extensive provincial investment in public transit throughout the Region is also confirmed in provincial policy. The geographic relationship of Halton Region to Peel Region, and of the Towns of Halton Hills and Milton to the Cities of Brampton and Mississauga influences growth. For some decades, the Region of Peel has accommodated the bulk of growth in the western GTA. Mississauga is now largely developed and Brampton is rapidly moving towards its final build-out stages. Pressures for both employment and housing growth are increasingly shifting westward into Halton Region. Through all of this, the Highway 401 corridor in the GTA will continue to be the "economic main street" of Ontario. Residential/mixed use growth while guided by policy will be influenced by a combination of: memployment opportunities being within reasonable journey-to-work distances; more proximity to commercial, social and cultural facilities; matural heritage features that provide attractive residential and recreational locations; and, minfrastructure networks that can accommodate the expanded growth and development opportunities. Lands located immediately south and west of Georgetown are well located relative to employment growth in both Halton and Peel Regions and would, as part of Georgetown, build upon the existing commercial, social and cultural facilities that make for a viable community. The Natural Heritage System in this area will help make for attractive, desirable and sustainable development. These lands should be designated for development.	RESPONSE
	To accommodate growth, Halton Region needs to assess its current and future infrastructure needs. Of critical importance to this assessment is the ability of the Town of Halton Hills to sustain significant development in the absence of services from/to Lake Ontario. Currently the Georgetown urban area in the Town of Halton Hills is serviced by well water and local wastewater treatment facilities. Recent research by Dr. Ken Howard, set out in his report Georgetown Area Groundwater Assessment (June 2008), revealed that future growth in Georgetown should not rely on developing additional groundwater sources. To protect groundwater resources and safely accommodate growth, Halton Region must look to extending its lake-based water supply infrastructure to Georgetown. A lake-based water reservoir is already planned by the Region on lands located within Georgetown Commons and this facility can be designed to serve new development in south Georgetown. Similarly, lake-based wastewater conveyance already extends north of Highway 401 to employment lands along Steeles	Please refer to section 5.6 of this submission (page 116) for the response to the technical report "Georgetown Area Groundwater Assessment".

Source	SUBMISSION	Response
	Avenue in the Town of Halton Hills and the Town of Milton. These services will need to be extended further to accommodate expanding employment uses along the north side of the Highway 401 employment corridor. It would seem appropriate to also extend wastewater conveyance services into Georgetown Commons, only a few kilometres north. This report concludes that in considering the location of additional land designations for urban growth in Halton Region, it is vital to recognize the ongoing economic importance of the Highway 401 corridor for future employment uses and the need to develop geographically appropriate residential and mixed use urban growth while seeking to maximize the potential of existing and proposed infrastructure. The most effective way to accomplish this objective is through "balanced" growth, encouraging simultaneous employment and residential/mixed use growth north and south of Highway 401.	Comments noted
	The Balanced Growth Concept presented in this report adds an initial growth phase of 3,239 hectares of urban land to Halton Region of which 772 hectares are for employment uses and 2,467 hectares are for residential/mixed uses. For new employment growth the Balanced Growth Concept shows a distribution of 340 hectares to the Town of Halton Hills, and 432 hectares to the Town of Milton; accommodating additional employment growth of 17,000 jobs in the Town of Halton Hills, and 21,600 jobs in the Town of Milton. For residential/mixed use growth the Balanced Growth Concept adds 984 hectares to the Town of Halton Hills and 1,483 hectares to the Town of Milton; accommodating an additional population of approximately 49,200 in Halton Hills (25,329 of which could be accommodated on the Georgetown Commons lands) and 74,150 in the Town of Milton.	
	The Balanced Growth Concept responds most appropriately to the goals of the Sustainable Halton Evaluation Framework as well as the objectives embodied in the Province's guidelines in its Places to Grow policy and it's Provincial Policy Statement (2005).	
	2.0 Introduction The South Georgetown Landowners Group are property owners with land located in the area east of Trafalgar Road, north of the 5th Side Road, south of the 10th Side Road and west of Ninth Line (Mountainview Road) located immediately south of and adjacent to Georgetown in the Town of Halton Hills. These lands, approximately 800 hectares in area, are collectively referred to as "Georgetown Commons" and are shown on Figure 1.	
	The South Georgetown Landowners Group commissioned this report on urban growth in Halton Region in response to the	

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Source	SUBMISSION	Response
	Refined Concepts presented and discussed in Working Paper #1: Locating New Urban Land (Report PPW42-08), prepared by Urban Strategies for Halton Region as part of the Sustainable Halton Planning Process. The recommendations in this report build on the work contained in Working Paper #1, utilize the policies contained in the Provincial Policy Statement (2005) and Places to Grow (2006), and draw on information from a wide range of studies and reports related to the Sustainable Halton Planning Process. This report also considers available information regarding planning and development in adjacent municipalities in order to better understand the internal and external pressures and opportunities that may influence the distribution of future urban growth within Halton Region. The Province of Ontario has established targets for Halton Region to accommodate 780,000 persons and 390,000 jobs by 2031. That requires 390,000 additional population and 200,000 additional jobs over the 30 years from 2001 to 2031. The Hemson Consulting Limited studies undertaken for Sustainable Halton estimate that up to 4,200 hectares (600 hectares for employment and 3,600 hectares for residential mixed use) of additional land will be necessary for the Region to meet the minimum Places to Grow targets. As a result, major expansions to the urban areas of both Halton Hills and Milton will be necessary. In order for Halton Region to continue to offer a high quality of life to its residents and to remain economically prosperous, growth needs to provide opportunities for employment, distinctive communities and ample open space, all based upon a system of well planned and efficient infrastructure.	Please refer to the response regarding the updated land supply analysis in section 5.0 (page 112) of this submission.
	This report sets out a modified growth option, referred to as the "Balanced Growth Concept", as an alternative to the five Refined Concepts released with Working Paper #1. In this case, Balanced Growth is defined as an equitable and proportionate sharing between the Towns of Milton and Halton Hills of the greenfield residential/mixed-use growth where that growth responds to the expansion of employment along the shared Highway 401 West corridor. This option better addresses the goals Halton Region has set for itself in the Sustainable Halton Evaluation Framework as well as those embedded in Places to Grow and the Provincial Policy Statements.	
	3.0 Balanced Growth in Halton Region This review of the policy, geographic and economic contexts for growth in Halton Region demonstrates the importance of achieving balanced growth geographically within the Region. As the Sustainable Halton process has identified, the Towns of Milton and Halton Hills are best located and suited for urban expansion. The Balanced Growth Concept, described in	

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Source	detail later in this report, proposes to distribute growth between these municipalities in terms of location and scale to achieve the following goals: Economic development through the effective location of employment lands on both the north and south sides of the 401 Corridor. The development of employment uses along both sides of the 401 recognizes the continuing importance of the ongoing westward expansion of employment growth from Pearson International Airport. An effective distribution of new opportunities for economic growth that will benefit both the Towns of Milton and Halton Hills and Halton Region in general. Significant new Commercial/Industrial assessment shared by the Towns of Milton and Halton Hills The optimum use of the existing and planned transportation and transit networks both north and south of the 401 Corridor. Places to Grow illustrates future additions to the existing transportation networks and transit in the north-western edges of the Greater Golden Horseshoe. These new transportation corridors and enhanced public transit will provide additional opportunities for the movement of people and goods within and outside of Halton Region. The creation of new mixed use nodes and mixed use corridors based on existing roads and located as logical and complementary extensions to existing settlement areas. The new mixed use corridors proposed in the Balanced Growth Concept are intended to act as foci for future urban growth if required at a future time. A balance in future residential/mixed use development occurring simultaneously north and south of the Highway 401 West Corridor to take advantage of existing and proposed infrastructure and proximity to employment in both Halton and Peel Regions. Support for the Halton Enhanced Natural Heritage System by maintaining major open space areas and natural features by consolidating growth as a series of expanded nodes related to existing settlement areas. The cost effective extension of lake based services to the Highway 401 Corridor and the Georg	RESPONSE
	expanded nodes related to existing settlement areas. The cost effective extension of lake based services to the Highway 401 Corridor and the Georgetown Area providing reliable long term water and sewage capacity for existing and future residential and employment uses.	

Source	SUBMISSION	Response
	 4.0 Economic Geography Context Halton Region, located to the west of Toronto and adjacent to Peel Region, occupies an increasingly vital location within the economic geography of the Greater Golden Horseshoe. Halton Region is adjacent to Canada's largest and most intensive area of economic production. The forces of economic geography exert strong external spatial influences on Halton Region's growth. Those influences along with the Province's regional growth policies to manage them, must be taken into account in distributing population and employment growth between the Towns of Milton and Halton Hills, and in undertaking the physical land use planning to accommodate it. There are three main sources of external influence: The first is the high rate of population and employment growth seeking to settle in the Halton-Peel Region of the Greater Toronto Area, at the very time that development land resources in adjacent Peel Region are rapidly 	
	 depleting. The second is the spatial influences of the current and proposed trade corridors with the United States that greatly influence the geographic settlement structure of Halton Region. The third is the continued westward expansion along Highway 401, west into Halton Region, of what is already the largest concentration of economic production in Canada, anchored by Pearson International Airport. 	
	4.1 THE GREATER GOLDEN HORSESHOE AND PLACES TO GROW POLICY IN HALTON-PEEL From 2001 to 2006, the GTA population increased by almost 100,000 annually. Halton-Peel found itself accommodating just over 50% of the GTA total or almost 50,000 new people per year. It has been estimated that more than 50% of the GTA employment growth during that period occurred in Halton-Peel. With Places to Grow, the Province of Ontario both: (a)constructed targets for population and employment growth to be accommodated in Halton Region, and (b) programmed the enhancement and expansion of the system of higher order transportation links that make up the vital trade corridors.	
	While Places to Grow policies scaled down the required growth share for Halton-Peel as a whole, it allocated to Halton Region a minimum rate of growth that will: double its 2001 population to 780,000 by 2031, accommodating an additional 390,000 persons, more than doubles its employment to 390,000 jobs by adding 200,000 jobs while, enhancing the current expressway and transit links running through Halton Region and, adding both a Mid-Peninsular expressway (Niagara to GTA Corridor) and new northern Halton-Peel	

Source	SUBMISSION	Response
Source	Submission expressway (GTA West Corridor) from Bolton to Guelph through northern Halton Region. (see Figure 2) To meet the Places to Grow targets through the Sustainable Halton Planning Process, Hemson Consulting Limited developed estimates of additional designated land needs in the range of 3,000 to 4,200 hectares. • An estimated 600 hectares are recommended for employment purposes, and from 2,400 to 3,600 hectares are recommended for residential and related urban purposes. For reasons discussed elsewhere in this report, it is recommended that the scale of employment land be increased beyond the 600 hectares recommended in order to better achieve the Places to Grow and PPS (2005) policies.	Hemson Consulting Ltd has completed an updated land supply analysis which has resulted in an increase to the employment land needs, and a decrease to the mixed-use/residential land needs. Detailed information can be found in the reports, Sustainable Halton: Accommodating Growth to 2031 by Hemson Consulting Inc (Report 3.07)., and Working Paper #2: Concepts for Addressing Halton Region's Land Needs to 2031, by Urban Strategies Inc (Report 3.08).
		With respect to the employment land needs, based on additional detailed analysis (which included previously unavailable 2006 Census data), as well as further analysis of the type of employment development occurring in Halton, the employment land needs has been increased to a total of 1,100 hectares. Please refer to the above noted report by Hemson Consulting for further information. Please also refer to the response regarding the updated land supply analysis in section 5.0 (page 112) of this submission.
	4.2 LOCATING EMPLOYMENT LAND USES IN HALTON HILLS AND MILTON Transportation infrastructure is the strongest force channelling economic growth momentum. As illustrated on Figure 3, Halton Region is an integral part of the west sector of the GTA, within which most of Ontario's major transportation corridors interconnect; including Highways 401, 403, 407, 409, 410 and 427. Running through and interconnecting in Halton Region are all of the rail lines critical to the economic prosperity of Ontario. Inter-modal facilities in Halton are vital to truck/rail transhipment. Three GO Transit lines provide superior regional transit services to all urban communities in Halton Region, offering great potential and expectation for expansions to public transit. The Lester B. Pearson International Airport, in immediate proximity to Halton Region, adds another layer of vital transportation capacity, especially for head office functions.	

Source	Submission	Response
SOURCE	The employment land supply in Peel Region is already largely depleted. Only signature office development sites remain available along Highway 401 east of the Credit River. Only the Bramwest employment area of Brampton (adjacent to the Town of Halton Hills) has significant inventory of standard employment land. • The depletion of prime employment land stocks in Peel Region, together with the extraordinary transportation infrastructure advantages are accelerating the westward shift of demand into the Towns of Milton and Halton Hills. For the foreseeable future, the Highway 401 Corridor with its expressway and rail lines, already carrying the enormous flows of exports and imports in convoys of trucks and rail cars, will combine its role as a major international trade corridor while becoming the economic "main street" shared by the Towns of Milton and Halton Hills. These observations strongly support the Sustainable Halton and Balanced Growth Concept recognition of the need to allocate employment land along the Highway 401 West corridor as the major employment spine. They also support the Places to Grow policy. 4.3 LOCATION OF RESIDENTIAL AND MIXED LAND USE IN HALTON REGION Location criteria for residential and mixed land uses are more flexible. While guided by Places to Grow and PPS policy, the demand locations will be influenced by a combination of: • employment opportunities being within reasonable journey-to-work distances: • proximity to commercial, social and cultural facilities; • the attraction of natural heritage features that provide premiums for residential and recreational use; • infrastructure networks that both enhance and constrain development poportunities; and, • the status of competitive residential land inventories. The rapid growth of Milton since the year 2000 is evidence of these influences at work, especially the residential demand response to employment growth patterns. By contrast, slow growth in the Georgetown area is entirely the consequence of limitations resulting from the lac	Through the Sustainable Halton process, the Highway 401 corridor has been identified as a significant location for employment as it is a preferred trucking route, and the surrounding lands have good access to Highway 401 and benefit from strong connections to existing employment areas.

Source	S	UBMISSION	Response
	From an economic perspe in Milton and Halton Hills vexpanding employment opemployment corridor, in acas well as in the Towns of For the planning of fugrowth in Milton and hinfluences, particularly growth, suggest a price Highway 401 with a sonorth and south of that The Balanced Growth is the most appropriate economic geography Halton Region will contain the Balanced Growth Coadds an initial growth phase Halton Region of which 77 and 2,467 hectares are for Balanced Growth Coadds an initial growth phase Halton Hills Share Milton share Total Mixed Use added persons) Halton Hills Share Milton Share Total Land added** *25,329 of which could be Commons lands **all numbers in the Balance as well a	ctive, future residential development will continue to be attracted by the portunities along the Highway 401 lijacent Mississauga and Brampton, Milton and Halton Hills themselves. ture residential and mixed land use Halton Hills, the above noted major by the location of future employment ority on lands that are well-related to bound, balanced distribution to the ent employment growth corridor. The Concept presented in this report the response to the context of within which the development of mitinue. The Concept of 3,239 hectares of urban land to 2 hectares are for employment uses residential/mixed uses. The Concept of 17,000 jobs) and hectares (17,000 jobs) and hectares (17,000 jobs) and hectares (21,600 jobs) and hectares (21,600 jobs) and hectares (49,200 persons) and he	The Balanced Growth Concept identifies a population of 49,200 in the Town of Halton Hills on the mixed use lands. This population exceeds the upper range of potential population growth identified for Halton Hills in the refined Growth Concepts (the refined Growth Concepts consider a range of population growth for Halton Hills – no additional population growth, 20,000 additional people, or 40,000 additional people). The total population to the year 2031 being planned in the Balanced Growth Concept would result in the Region's population exceeding the targets set out in Schedule 3 of the Provincial Growth Plan. Halton Hills Council, through staff report PDS-2008-0065, have endorsed a preferred scale of expansion for mixed use residential development to the Georgetown Urban area during the period 2021-2031 not greater than the magnitude of 20,000 estimated persons. The updated land supply analysis completed by Hemson Consulting Ltd. (as described in the response in section 4.1 of the submission) which has increased the employment land needs, has also resulted in a

Source	SUBMISSION	Response
		decrease of mixed-use/residential land needs. Please refer to the reports, Sustainable Halton: Accommodating Growth to 2031, by Hemson Consulting (Report 3.07), and Working Paper #2: Concepts for Addressing Halton Region's Land Needs to 2031, by Urban Strategies Inc. (Report 3.08), for a detailed explanation of the updated land supply analysis and land needs.
	According to Sustainable Halton studies, the remaining 266,000 added population and 161,000 jobs would then settle onto existing designated greenfield lands and through infill development of existing developed urban land.	In order to meet the Greenfield density targets established in the Provincial Growth Plan, the updated mixed-use/residential land needs is now 1,680 hectares. Please refer to Report 3.08: Working Paper #2: Concepts for Addressing Halton Region's Land Needs to 2031 for updated population and employment figures.
	The designation of 770 hectares of employment land as shown in the Balanced Growth Concept, is somewhat greater than the 600 hectares recommended by Hemson Consultants Limited. The increase is based on a number of factors: Experience has shown that in dynamic, rapid growth areas such as Halton Region, successful attraction of employment-generating investment requires a much higher ratio of supply to demand. For a strong economy the market needs wide-ranging choices and flexibility to supply specialty employment land while maintaining competitive pricing. Places to Grow and the Provincial Policy Statement (2005) provide supporting policies. Recognizing that the Halton Region economy is integrated with that of Peel Region, the proportion of Halton Region employment growth on employment land and in industrial/warehousing and related uses, as well as low-rise office campuses is likely to be higher than projected. That significantly increases the quantity of employment land needed. Finally, location trends show a growing proportion of the population-related employment categories, such as retail development, prefer integration in employment lands. In Milton and Halton Hills for example the lands in the vicinity of the Steeles Avenue crossing of Highway 401 are being developed for retail and retail services. In our view the proportion of population-related employment that will accrue to employment land will be much higher than the 5% allowed for in the initial estimates by Hemson	Please refer to the response in section 4.1 of this submission for a discussion of the updated employment land supply analysis completed by Hemson Consulting Ltd., which has increased the employment land needs to 1,100 hectares. The refined Growth Concepts allocate 340 hectares of employment in Halton Hills, along the Highway 401 corridor.

Source	SUBMISSION	Response
	Consulting Limited.	
	In order to facilitate clear comparisons between the Balanced Growth Concept and the options presented in Working Paper # 1, the Balanced Growth Concept has been illustrated using the same base drawing and graphics utilized by the authors of Working Paper # 1. For ease of discussion and comparison, this alternative utilizes the same basic assumptions as identified in Working Paper # 1, adding additional information where appropriate as noted. This is not necessarily meant to infer agreement with these basic assumptions at this time.	The lands identified for urban development on the Balanced Growth Concept are all being considered as potential locations for new urban areas in one or more of the refined Growth Concepts, based on the updated land needs analysis (see <i>Report 3.08: Working Paper #2</i>).
	The structure of the Balanced Growth Concept is outlined in the following sections: Land Use and Connectivity Maintaining Community Identity Agricultural and Rural Lands Mineral Aggregate Resources Accommodation for Future Transportation and Transit Infrastructure Water and Waste Water Management Future Urban Growth MAP SOURCE: Sustainable Halton Working Paper #1: Locating New Urban Land (modified)	
	 5.1 LAND USE AND CONNECTIVITY The Balanced Growth Concept has been structured to achieve its goals through the organization and distribution of its land uses. The plan proposes to direct new urban growth into three areas: Southeast Milton directly west of Bronte Creek: Urban Growth is proposed to be focused on a node formed at the intersection of Britannia Road and the southern extension of the James Snow Parkway and will be supported by the intersection of two resulting mixed use corridors (per Working Paper #1 options 2a and 2b). 2) The 401 corridor in northeast Milton (south Hornby) and southeast Halton Hills: This node has been selected to support the western 	The lands shown on the Balanced Growth Concept submitted by the South Georgetown Land Owners Group are all being considered as potential locations for new urban areas in one or more of the final Growth Concepts, and based on the most recent land needs analysis. See Report 3.08: Working Paper #2: Concepts for Addressing Halton Region's Land Needs to 2031 (Urban Strategies Inc.)
	expansion of employment uses along Highway 401 from Lester B. Pearson International Airport located to the east in the City of Mississauga. The node contains opportunities for potential employment uses on both the north and south sides of Highway 401 and to start a potential pattern of employment uses running south along the western side of Highway 407. This node also contains opportunities for mixed use residential lands focused on the intersection of a mixed use corridor on Trafalgar Road and the potential for a new GO station that may evolve into a major transit interchange/gateway hub. The proposed employment uses in this area are further supported by the Canadian Pacific Railways intermodal transfer site located to the west of Trafalgar Road and south of Highway	The locations of nodes and corridors shown on the Growth Concepts released in June 2008 are illustrative only. The locations of nodes, corridors and other land use designations will be determined by the respective Local Municipalities.

Source	SUBMISSION	Response
Source	3) South and Southwest Georgetown in the Town of Halton Hills: This node of potential mixed use residential lands is located as an extension of the western and southern urban boundary of the Georgetown settlement area, framed by Trafalgar Road on the west, Ninth Line (Mountainview Road) and Tenth Line on the east and by the 5th Side Road on the south. The Balanced Growth Concept proposes that this node be focused on the intersection of the 10th Side Road and Ninth Line (Mountainview Road). To strengthen the role and viability of this node, the southern end of Ninth Line (Mountainview Road) is proposed to be realigned, bending westward to connect to Trafalgar Road north of Highway 401. This realignment of Ninth Line (Mountainview Road) is intended to facilitate a direct link between the existing major commercial and employment areas of Georgetown, the new mixed use node, and the existing and proposed employment areas located along the Highway 401 corridor. The proposed realignment will help facilitate access to regional and international markets and also have the effect of improving the link between the Georgetown GO station, the planned future GO station on Trafalgar Road at Highway 401 and the existing Oakville GO station at Trafalgar Road and the Queen Elizabeth Way further to the south, thus promoting flexibility in transit opportunities across the region. 5.2 MAINTAINING COMMUNITY IDENTITY The locations selected for the expansions of existing urban areas shown in the Balanced Growth Concept have been chosen to achieve meaningful and efficient use of land while preserving the individual identities and characteristics of the municipalities within Halton Region. This Balanced Growth Concept maintains, for the immediate future, un-urbanized lands between Georgetown and Highway 401, between the Town of Milton and the Town of Oakville, between the Town of Milton and the City of Mississauga, and between the Town of Milton and the City of Mississauga, and between the Town of Milton	RESPONSE
	and the City of Burlington. Urban areas are separated but strongly connected by a web of transit, transportation and infrastructure.	
	5.3 AGRICULTURAL AND RURAL LANDS Within the Balanced Growth Concept, connections between rural lands have been maintained as discussed generally in Working Paper #1 and as presented in the refined concepts. Currently, the lands on the western side of Peel Region, bordering Halton, create an almost solid wall of General Industrial Land that makes any proposed interconnection to agricultural lands in this area pointless. Instead, future connectivity within viable agricultural areas should been maintained.	Halton Region is developing an agricultural strategy that provides support for sustainable agriculture in the Region through tools and initiatives to support the agricultural community (see <i>Report 3.04: Agricultural Countryside Strategy).</i>
		The Region has developed an

Source	SUBMISSION	Response
	5.4 MINERAL AGGREGATE RESOURCES Proposed mixed use residential lands adjacent to Georgetown have been selected to avoid incursion into areas of potential aggregate resources. 5.5 ACCOMMODATION FOR FUTURE TRANSPORTATION and TRANSIT INFRASTRUCTURE	aggregate strategy (see Report 3.05: Aggregate Resource Management in the Region of Halton, Part 2— Establishing a Policy Framework). The resulting policy framework will be incorporated into the Regional Official Plan.
	The Balanced Growth Concept provides opportunities for the extension of additional highway connections and transit improvements that would provide further opportunities for the movement of goods and services throughout the Greater Golden Horseshoe.	
	These possible transport connections include the:	
	 Southern extension of the James Snow Parkway Connection of the proposed Niagara-GTA Corridor (Mid-Peninsular expressway) through the southwest corner of the Town of Milton, as shown in Places to Grow, the Growth Pan for the Greater Golden Horseshoe (2006). Extension of the contemplated north/south major arterial road from the western edge of the City of Brampton through Halton Region south of Georgetown to Highway 401/407. 	
	At this time, considerable flexibility remains to plan for and construct a Regional road system tailored to the ultimate land use plan.	
	5.6 WATER AND WASTE WATER MANAGEMENT Water and wastewater servicing of the Balanced Growth Concept is based on the extension of the lake-based servicing infrastructure to new growth areas. This is consistent	Response to Technical Report: Georgetown Area Groundwater Assessment (by Dr. Ken W.F. Howard)
	with the premise contained in the Working Paper #1 and is supported by the conclusions of a report prepared for the South Georgetown Landowners Group by Dr. Ken. W.F. Howard MSc, PhD, PHG, PGeo, CGeol, FGS, (University Professor and Groundwater Consultant) "Georgetown Area Groundwater Assessment (2008)".	This report concludes that long-term growth in Georgetown will require a lake-based water source. This conclusion is consistent with the information presented through the Sustainable Halton process an urban
	Dr. Howard assessed the availability of groundwater for the servicing of future development in the Georgetown area. This assessment concluded that groundwater has serviced the existing community of Georgetown well over the years and could, with adequate protection and sensible management	boundary expansion for Georgetown will likely not be supported by municipal groundwater supply and will require lake-based servicing.
	continue to meet the needs of the existing community. However, these resources now show signs of stress and additional groundwater reserves are proving difficult to locate. Should additional water supply be found, Dr. Howard recommends that it be held in reserve for emergency use to	However, it is important to note that the municipal groundwater system will continue to be the water supply source for Georgetown until there is an alternate lake-based system, and the municipal groundwater system
	serve the existing community and rural areas. Recognizing that local groundwater reserves are rapidly approaching limits of sustainability, Dr. Howard also concludes that a significantly	may continue to be supported even if there is also a lake-based supply to Georgetown. Therefore, Halton will

Source	Submission	Response
SOURCE	more reliable lake-based water source is essential to support growth in the Georgetown area in the long term. The Region of Halton's new South Halton Water and Wastewater Master Plan (2008) includes plans to construct a watermain up Trafalgar Road to feed a future reservoir located on lands within Georgetown Commons. Therefore, lake-based water infrastructure is currently planned to be constructed to the south boundary of development in Georgetown as proposed in the Balanced Growth Concept. Extension and expansion of this planned water infrastructure could service new growth in Georgetown and other areas. All five Sustainable Halton Refined Concepts presented in the Working Paper #1 include new employment in areas north and south of Highway 401 in Milton and Halton Hills. Lake-based services are already available to the existing designated employment lands north of the 401 along Steeles Avenue. Extension of these Region of Halton lake-based services to the future Highway 401 employment corridor will bring wastewater infrastructure to within 2 km of the south boundary of development in Georgetown as proposed in the Balanced Growth Concept and could be reasonably enlarged and extended as necessary. Growth in the Georgetown area can maximize the use of existing and planned infrastructure through the use, extension and where needed, the expansion of planned South Halton lake-based infrastructure. The scale of growth in the Georgetown area should be established to maximize the efficiency of delivery of lake-based services. 6.0 Future Urban Growth The structure proposed by the Balanced Growth Concept provides an efficient and equitable foundation for both current and future growth. Figure 7, the plan for Future Urban Growth Plan sets in place a pattern for the rational expansion of employment lands south along the west side of Highway 407 and west along the north side of the Highway 401 corridor while providing opportunities for flexibility in making future choices regarding further residential and employment ex	continue to manage and protect the municipal groundwater system for Georgetown. Also, it is important to note that the report does not reference the most current information regarding the Georgetown groundwater system. In particular, significant work on a comprehensive groundwater model for the Georgetown area has been completed in recent years that has contributed to the understanding of the sustainable taking for municipal drinking water supply. Also, a Water Budget and Water Quantity Risk Assessment Study for the Town of Halton Hills (Acton and Georgetown) funded by the Province is currently underway, which will result in a defensible water budget that confirms the sustainable taking for municipal water supply purposes. This information will be available as an input to the development of the Halton Water and Wastewater Master Plan based on the Sustainable Halton preferred growth option.

Source	SUBMISSION	Response
	 Environment – Bird and Hale Ltd Agriculture – AgPlan Soils – Terraprobe Mineral Aggregate – Trow Consulting Engineers Ltd. and AMEC Solicitor – Davis LLP Development Management and Communications – R.G. Richards and Associates Supporting technical reports: Georgetown Area Groundwater Assessment – Ken Howard (July 15, 2008) 	
Sustainable Urban Development Association August 26,2008	Re: Meeting the Sustainability Challenge in Halton SUDA has been observing the development of official land use and transportation plans across the Greater Toronto Area, including efforts by municipalities to conform to Places to Grow legislation. SUDA's focus is to foster a healthier natural environment by providing information about sustainable citybuilding. Our focus is a reflection of the deep concern of SUDA's Board members for the well-being of the residents of the Toronto region, including especially the children that will inherit the outcomes of decisions made today. One aspect of sustainable urban development relates to greenfield development. We are finding that municipalities are targeting provincial minimum density standards for residential and employment development as being maximums, rather than evaluating whether higher densities are the appropriate municipal strategy for economic, environmental and social sustainability as municipalities grow. What is also unclear is the degree to which Councilors, Mayors and Regional Chairs recognize the importance of their decisions on the sustainability and well-being of their city or town. The provincial minimum density standard of 50 residents and jobs per gross hectare for greenfield development. It will result in excessive energy costs and loss of rural lands, and minimal potential for sustainable urban development. It will result in excessive energy costs and loss of rural lands, and minimal potential for sustainable transportation. These impacts are important reasons for significantly changing the way Halton Region grows over the next twenty-five years. Moreover, all of these reasons are linked to decisions made at local and Regional Councils, and affect the well-being of the people in your community. Some of the reasons for change include: 1. The availability and affordability of energy will become increasingly problematic, creating hardship for residents of your community. 2. The long term supply of agricultural lands, and	The following letter dated September 15, 2008 was prepared in response to the submission received: Dear: RE: Meeting the Sustainability Challenge in Halton Thank you for your letter and continued interest in our Sustainable Halton process. Your letter raises a number of valuable points that Halton Region shares with you. We share your focus of fostering a healthier natural environment and also extend that focus to the other pillars of sustainability; social, economical and cultural. We recognize, as do you through your letter, the importance of the decisions facing Regional Council, and the Councils of our four Local Municipalities, through Sustainable Halton. Regional Council has begun this difficult decision-making process beginning with the decision to implement an enhanced natural heritage system throughout the Region and applying this system as a starting point from which all growth concepts began. We acknowledge that Regional and Local Councils will face many more difficult decisions over the next nine months as we continue to make our way towards a preferred growth option to implement our legislated requirements in <i>Places to Grow</i> . We agree that a reduction of travel by

Source	SUBMISSION	Response
Source	food security for the GTHA, are rapidly being compromised by low density urbanization; populations are growing as foodlands shrink everywhere. 3. Many households are struggling with finances and family time due to costs of home ownership and daily travel times. 4. Car-dependency inherent in suburban living creates a multi-billion dollar annual drain on your local and regional economies; in Halton and in Ontario, almost all motor fuels and approximately 85% of vehicles bought in your communities are imported. 5. Traffic is getting worse. Failure to plan for reductions in motor vehicles kilometers will increase hardship for residents. 6. Exclusionary housing policies are creating social divides and difficulty for residents and workers in municipalities across the GTA. 7. Air pollution from local transportation and industrial sources is damaging the health of people. 8. Greenhouse gases generated in Halton are increasing instead of decreasing, contributing to climate destabilization. 9. Per capita infrastructure costs are becoming very expensive. Whether these problems are reduced or exacerbated depends a great deal on local decisions. For example, Halton Regional Council can determine the degree to which people can reduce their dependence on travel by personal automobile, through more aggressive transit expansion, densification and by better mixing of land uses. It also determines the degree to which nousing is provided in more energy-efficient and demographically-appropriate forms. Halton Regional Council determines overall population and employment densities that either preserve or consume rural lands, and lengthen or shorten the time horizon of land supply for urban uses. Generally speaking, we are observing that GTA municipalities, including the Regional Municipality of Halton, are failing to keep significant problems from getting worse. A number of factors are contributing to worsening conditions, including, among others, the following:	personal automobile is needed as is increasing the density of development and requiring a better mix of land uses in areas that support transit. These are goals and objectives that form part of our Evaluation Framework which will be used to evaluate growth options, helping us to reach a decision on a preferred growth option, one that meets, and in some cases, exceeds the principles, goals and objectives of our Evaluation Framework. For example, Bus Rapid Transit is planned along the Trafalgar Road corridor in Oakville, connecting to the Oakville GO Station. This is a first step towards improving transit within Halton Region. We will continue to work closely with Metrolinx to ensure the goals of increased transit in the Region are achieved. We hope that you have reviewed our Evaluation Framework to get a better sense of how we view Halton to the year 2031. We share your concerns on the issues you have identified on the first page of your letter. These issues, plus many others, were components of the Phase I Background Reports of Sustainable Halton. These reports were adopted by Regional Council in December 2007. Your letter causes some issues that require further explanation. Your letter states that the provincial minimum density standard of 50 people and jobs per hectare falls short of achieving sustainable urban development and that municipalities are targeting these density standards as maximums instead of evaluating whether higher densities are more appropriate. The Sustainable Halton process is currently evaluating what densities
	Assumptions about 'Local character'. Some existing residents will inevitably see changes in or near their neighbourhoods as requirements for intensification and infill are implemented; this will require good design, and efforts by local government to demonstrate its many benefits. However, greenfield lands designated for growth at the fringes of your urban area are blank slates. Many opportunities exist for innovation and creativity; issues of existing 'local character' are much less	are needed within the designated greenfield areas to achieve the minimum target across the entire Region. Halton's Official Plan, in 2004, established the nodes and corridor policies which promote higher densities in these areas. Our focus now is on what densities are

Source	Submission	Response
	relevant, especially at this critical time. For example, many current residents are concerned about preserving their rural lands, yet if plans are implemented to develop greenfield lands at or near minimum density standards, much of those lands will be rapidly lost. **Attitudes on tax levels** Municipalities often focus on short-term solutions in order to minimize property tax levels, and this sometimes prevents progress, such as on greenhouse gas emissions, traffic congestion and household travel costs. With regard to transportation, SUDA's has shown that while investment in the operation of public transit across the GTA is very low (only 2% of property taxes in Halton), there is a significant willingness on the part of the public to pay for better transit. As well, better policies on land development can be implemented at minimal cost. **Pressures from land developers**.** Municipalities control how much development occurs and what its form and shape will be. Unfortunately, land developers often have a disproportionate and unnecessary amount of influence on the decisions you make, and their preference is to build what has sold well in the past. Decisions made today by Council on the development of new communities will determine how well those communities will respond to critical needs of households. Adequately addressing what we see building in the 21st century – energy shortages, environmental damage, economic turbulence, etc. – is much more important than continuing outdated 20m century practices. Truly sustainable communities for the future will also be highly marketable, providing healthy returns on investment for the land development industry. **The critical keys to success during this time of rapid urban growth are twofold, and interrelated: Significantly increasing urban densities in a pleasant, family-friendly and highly mixeduse manner, and investing in solutions that reduce total number of vehicle-kilometres even as population grows, including multiple expansions of public transit. **SUDA* and o	needed at nodes and along corridors to ensure new development is transit supportive. We also note that existing greenfield areas in Halton are exceeding 50 persons per hectare in terms of density. Finally, we will implement densities that achieve our goals of protecting farmland, enhancing the natural system, less sprawl, better use of infrastructure, and creating more liveable communities. As well, in relation to your comments that "issues of existing 'local character' are much less relevant, especially at this critical time" our community sessions have shown that the public is very supportive of preservation of their local character. We believe that achieving the provincial growth targets can be achieved while retaining the local character of the communities within Halton Region. Thank you for your continued interest in Sustainable Halton.

Source	SUBMISSION	Response
	highly mixed use land development than Halton is planning means that walking and bicycling would take a much greater share of all daily trips, and that the average trip length (the determinant of traffic volumes) taken by automobile will be shorter. It also means that much more intensive public transit services can be provided. Demand for transit will be reinforced by long term increases in gasoline prices. SUDA suggests that very aggressive, several-fold increases in transit services can be marketed to taxpayers and implemented during immediate planning horizons without significant funding from upper levels of government. Reducing motor vehicle kilometres is critical to reducing economic losses from high energy costs, improving affordability of travel for households, significantly reducing greenhouse gas emissions fro current levels, and alleviating traffic congestion. The public depends on you and other members of Regional Council to provide leadership and appropriate action during this time of rapid change. The official land use and transportation plans that are currently being revised to accommodate growth targets must not result in conditions becoming worse over time. SUDA recommends that you take steps to ensure that this end-result evaluation be done as soon as possible, and that critical targets be met. SUDA welcomes your comments and questions, and is available to meet with you to discuss these and related issues, or to provide Powerpoint presentations related to sustainable urban development. Please contact John Stillich, SUDA's General Manager, for more information.	
Wellings Planning Consultants Inc. for Maple Mist Development Corporation September 3, 2008	Re: Sustainable Halton – Physical Structure Concepts 2021-2031 Maple Mist Developments Corp. Part of Lot 4, Concession 9 Town of Halton Hills (Esquesing) Regional Municipality of Halton Our File No.: 2008/31 We are Planning Consultants for Maple Mist Development Corp ("Maple Mist") which owns approximately 41 Hectares (102 acres) of land located east of the Eighth Line, south of 5 Side Road and north of Steeles Avenue in the Town of Halton Hills. The property is situated mid-point between the existing Georgetown Urban Area and the (Highway) 401 Employment Corridor. The property is legally described as Part of Lot 4, Concession 9 in the former Township of Esquesing, and now part of the Town of Halton Hills. The subject property is situated within the "white belt" of the Growth Plan and is identified within the Primary Study Area to assess Halton's Growth to 2031. The Land Supply Analysis	

Source	SUBMISSION	Response
	Technical Background Report provided for a range of urban land (i.e. 3,000 – 4,200 gross hectares) required to accommodate growth in Halton between 2021 and 2031. The refined concepts currently under discussion are based on the lower range of the anticipated urban land needs (i.e. 3,000 hectares). The deduction of natural heritage features from developable land does not appear to have been taken into account in the aforementioned figures.	For the purposes of the Growth Concepts, the entire Natural Heritage System has been excluded from the land calculation.
	 We are writing with respect to two major areas of concern: Conclusions which propose that the Maple Mist lands remain Agricultural in the long term in conjunction with a "Continuous Farmland Connection to Greenbelt" overlay and, Lack of recognition for future urban lands that will be required by longer-term growth and the potential for an insufficient amount of urban land necessary to accommodate growth, to be designated as part of the current Sustainable Halton exercise. 	The Region has prepared a series of supporting Technical Reports to inform the Sustainable Halton process moving forward and to provide direction on policy development. Among the reports is an Agricultural Strategy for Halton Region which does not rely on the "Continuous Farmland Connection to the Greenbelt" concept.
	By concluding that lands south of Georgetown and north of the 401 Employment Corridor Area should remain agricultural, we believe the Region is being inconsistent with Provincial and Regional objectives of contiguous development and efficient use of infrastructure. The Maple Mist lands also lie within a "Continuous Farmland Connection to Greenbelt" overlay. While it is unclear as to whether this overlay is intended to become a designation within the Official Plan or simply a temporary identifier of existing conditions, based on conclusions reached within Working Paper #1, the "Continuous Farmland Connection to Greenbelt" overlay is being used as an "Urban Separator". While this concept has been used by Halton in the past, we believe it is now contrary to current policy objectives of compact, contiguous and efficient development. We are concerned that conclusions reached to date and the "Continuous Farmland Connection to Greenbelt" overlay amount to a predetermination regarding the necessity of additional urban land by the removal of these lands from future urban assessment and development. We also note that this overlay is being applied, even though the identification and preservation of prime agricultural lands has not been determined relative to the refined concept plans according to Report PPW42-08.	With respect to the concern expressed about conclusions being made in Working Paper #1 (Attachment #2 to Report PPW42-08), staff advise that the Conclusions map that was illustrated on page 33 of Working Paper #1 identified key conclusions from the "idea-testing" exercise that took place when the Nine Initial Concepts were reduced to Five Refined Concepts. These conclusions were not meant to represent the final choices. The overlay is not being used as an "Urban Separator". The lands referred to as Part of Lot 4, Concession 9, Town of Halton Hills (Esquesing) are included in the Primary Study Area (PSA). All lands within the PSA were considered as potential locations for new urban land. Through the analysis undertaken as part of Working Paper #1: Locating New Urban Land, and the recent Working Paper #2: Concepts for Addressing Halton Region's Land Needs to 2031 (Report 3.08), by Urban Strategies Inc., the above referenced lands

Source	SUBMISSION	Response
		were deemed to be too far removed from existing settlement areas and planned transit services to be included in the refined Growth Concepts. This conclusion does not preclude consideration of the lands for future urban development beyond the year 2031.
	It is inappropriate to consider or predetermine a continuous agricultural connection (or any landform permanence) at this stage without a better understanding of the agricultural potential coupled with the future urban land needs and a full understanding of net developable lands in light of limiting factors such as an Enhanced Natural Heritage System. The "Continuous Farmland Connection to Greenbelt" overlay should therefore, be removed from any further growth options study so that the Maple Mist lands and surrounding area can be considered on the land use merits for future urban growth.	The recently completed Agricultural Strategy for Halton Region builds on the existing agricultural policies of the Regional Official Plan by introducing a series of tools and initiatives aimed to support the agricultural community and sustainable agriculture in the Region and does not propose the protection of a permanent agricultural reserve (Please see Report 3.04: Sustainable Halton Phase 3: Agricultural Countryside Strategy, by Planscape).
	The Maple Mist property is located on Eighth Line which is a key north-south transportation corridor linking the 401 Employment Corridor and the Georgetown community. The Eighth Line will likely emerge as a future transit corridor serving southern Halton Hills and the Georgetown communities. North-south corridors such as the Eighth Line will become very important transit linkages to connect the residential (i.e. Georgetown) and Employment (i.e. 401 Corridor) sectors in the Halton Hills community. The Region has the ability to create an efficient transit and transportation system by taking advantage of opportunities to complete communities through the development of lands which lie adjacent to existing urban areas, infrastructure, and employment generation.	Eighth Line's potential as a "very important transit linkage" has not been demonstrated.
	While we recognize that not all white belt or primary study area lands can be identified as "Urban" at this time, we believe it is important to provide for and protect for the opportunity to achieve the upper range of growth figure (i.e. 4,200 hectares) either through the enlargement of "Urban Land" within the refined concepts under discussion or alternatively through a policy framework and the identification of lands outside the refined concepts as "Future Urban". This identifies potential development lands at an early stage should the net growth areas, after non-residential take-outs, (e.g. natural heritage system, transportation corridors, institutional uses etc.) not be sufficient to accommodate projected growth. In our opinion, it is conceivable that both the lower and upper growth limits of 3,000 and 4,200 hectares may be inadequate and believe that it is inappropriate to not consider the benefits derived from providing growth between the existing Georgetown community	Updates to the land supply analysis as documented in <i>Report 3.07: Sustainable Halton: Accommodating Growth to 2031</i> by Hemson Consulting Ltd., have resulted in 2,780 hectares of land required to accommodate growth to 2031 and meet the requirements of the Provincial Growth Plan. Lands within the Primary Study Area not required for urban growth will continue to be designated Agricultural Rural Area. Future urban expansions can be considered in subsequent comprehensive reviews of the Regional Official Plan. [A]

Source	SUBMISSION	Response
	and 401 Employment Corridor lands. It would appear logical that there be a southerly expansion to the Georgetown Urban Area and that any further expansion of urban areas will be serviced by a lake-based servicing system. This servicing system would logically be located in an infrastructure corridor extending northerly from the south. It would be prudent for the Region to ensure that this infrastructure has sufficient critical mass of urban land to finance such an undertaking. The Maple Mist lands are ideally positioned within such a corridor. In conclusion, we believe that it is premature to potentially eliminate the subject lands for future urban use through the identification of a continuous farmland connection as it purports to eliminate future growth opportunities through the identification of an additional rural function that already exists to the north within the Greenbelt. Furthermore, it is not possible at this stage to fully determine whether 3,000 or even 4,200 hectares is sufficient given the uncertainty with respect to net developable areas, ability to achieve projected growth targets and the extent of natural heritage features/enhanced natural heritage system. As such, the Maple Mist lands should be identified as Future Urban and consideration should be given to a policy framework for more detailed planning and development of these lands.	See previous response. [A]
	Thank you for your consideration of this matter. We will contact you shortly to arrange a meeting so that we may discuss our submission in greater detail. In the meantime, we ask that you notify us of any future meetings/reports with respect to the Sustainable Halton process.	
Catholic Cemeteries of the Diocese of Hamilton September	Dear Sirs/Mesdames RE: Sustainable Halton Phase II – Growth Concept Plans and Proposed Catholic Cemetery in the Town of Milton (Report PL-66/08) Catholic Cemeteries of the Diocese of Hamilton	
12, 2008	The Catholic Cemeteries of the Diocese of Hamilton (the Diocese) has review report #PL-66/08 and generally concurs with the staff recommendation that the Region give consideration to the CN lands in southwest Milton as employment lands and hence, and urban expansion area in the Sustainable Halton Plan. Diocesan concurrence is founded on our objective to establish a long term Catholic Cemetery on 50ha of property in the Town of Milton located on Lower Baseline Road at Bronte Road, east of the CN lands and south of the Regional landfill, as shown on the attached plan.	The lands identified by the Catholic Cemeteries of the Diocese of Hamilton are included in the Primary Study Area and were considered as potential locations for new urban land. Through the analysis undertaken as part of Working Paper #1, and the more recent Working Paper #2: Concepts for Addressing Halton Region's Land Needs to 2031 (Report 3.08 by Urban Strategies Inc), the above referenced lands
	The Diocese has no specific request to make of the City of Burlington at this time, the Diocese only wishes to inform Council of its interests relative to the staff recommendation. By way of background since the late 1990s the Diocese has	were deemed to be too far removed from existing settlement areas to be included in the concepts. It also does not fall within the areas of Milton being considered as priority areas

Source	SUBMISSION	Response
JOURCE	been working to establish a long term cemetery in south Halton to serve the growing Catholic community of Milton, Oakville and Burlington east of the Freeman interchange. Although the Regional Official Plan permits cemeteries above the escarpment such a location simply is not practical for the Catholic community of south Halton given remoteness from the community served, lack of good highway access, especially for the elderly and planning limitations on major cemetery structures such as a mausolea.	most suitable for new mixed-use residential growth, which include the Trafalgar Road corridor, the Britannia Road corridor and the future James Snow Parkway corridor in south Milton. This conclusion does not preclude consideration of the lands for future urban development beyond the year 2031. The refined Growth Concepts identify approximately 200 hectares of employment in south Milton along Tremaine Road, adjacent to the rail line.
	Below the escarpment, cemeteries are regarded by the Town of Milton as an urban use. The Sustainable Halton Growth Concepts allocate some 600ha for 'other urban uses' beyond residential and employment land needs. However it is not clear whether land extensive uses such as a large cemetery fall into this category or are assumed to locate in existing urban designated areas. Given that a cemetery need cannot reasonably compete with urban land values but cemeteries are nonetheless regarded as urban uses, the Diocese must pursue and support an urban expansion area in Sustainable Halton which included the Diocese property. In considering first principles for growth beyond 2021, the Town of Milton has identified the need to consider additional employment areas, among others, lands in southwest Milton encompassing the CN lands, the landfill and the Diocese property. The Diocese supports the Town and subject to Town Council's final position, expects to pursue the cemetery proposal further with the Region and Province through the Sustainable Halton exercise. In summary, the Diocese supports the intent of the staff recommendation in Report PL-66/08 with respect to additional employment lands, hence urban expansion area in southwest Milton and informs Council that the Diocese will purse recognition of its lands in this area for a cemetery by way of a special policy area or similar recognition in the Sustainable Halton Plan.	"Other urban uses" in the mixed-use/ residential areas in the refined Growth Concepts would include population related employment (office, retail) and community uses such as schools, hospitals, libraries, community centres and parks. The Reg ional Official Plan does not specify permitted uses in the urban areas but defers them to the Local official plans. Permitted uses associated with the new growth areas would continue to be defined by the Local Municipalities through their official plans.
Glen Schnarr and	RE: Proposed Urban Area Expansion/Growth Options	
Associates	Region of Halton Sustainable Plan (SHP) Process	
for Atkinson/ DePaoli Properties	Atkinson/DePaoli Properties, Town of Halton Hills	
September 19,2008	We represent Atkinson and DePaoli properties in the Town of Halton Hills, who collectively own approximately 50 acres of developable tableland adjacent to the existing Georgetown	

Source	SUBMISSION	Response
Source	Urban Area and the Hamlet of Stewarttown (see attached map). This is further to our letter submitted to you and copied to the Town dated June 4, 2008. The June letter was submitted prior to the release of the Region's SHP Growth Options. The purpose of this letter is to supplement our June letter and provide more detailed comments on the merits of including our clients' lands for future residential development to meet the Provincial Growth Plan growth objectives. The subject lands are surrounded by the CN Railway to the west, the existing Stewarttown Hamlet boundary to the north and east and the Town's Rural Area/Protected Country Side to the south. The subject lands are designated "D3" in the Region of Halton Official Plan and the Town of Halton Hills Official Plan that was recently approved by the Region. The purpose of the deferral is to allow for the Region's Sustainable Halton Plan process to examine the merits of including these lands into the urban area. We had previously indicated that these lands represent a pocket of land in west Georgetown/Stewarttown that ought to be included as part of the existing Hamlet of Stewarttown or considered as a minor rounding out of the Georgetown Urban Area. We had also expressed that our client's lands are uniquely positioned to attract a well-designed upscale residential neighbourhood. The Town recently released a Discussion Paper on the Sustainable Halton Growth Options dated August 2008, which was subject of a Town Council Workshop on September 8 th . On page 86 of the Town's Discussion Paper, staff provided two possible options for including our clients' lands if Town Council supports our request. The two options that could be implemented are: 1. As the existing Stewarttown is confined in part by the Greenbelt Plan and the southern boundary is adjacent to areas where development pressures are particularly acute, our client's lands could be incorporated as part of incorporating Stewarttown within the Georgetown Urban Boundary; or,	The subject properties are outside of the limits of the Sustainable Halton Primary Study Area. The Town of Halton Hills has responded to correspondence regarding the Atkinson/DePaoli Properties in staff report PDS-2008-0065. The Town of Halton Hills advised of two options for the development of the subject properties – to incorporate Stewarttown, including the subject lands, within the Georgetown Urban Boundary, or to consider the request in the context of Hamlet expansion policies. The Region suggests that further consideration of the request take place in the context of future local urban structure planning. The Town will be further consulted on this matter.
	Include our client's lands in the context of the Hamlet expansion process with the preparation of a secondary plan supported by appropriate studies such as Black Creek Subwatershed Study. We trust Town staff will determine the most appropriate option, however our preferred option is #1 above. We would like to augment the Town's Discussion Paper by providing the following rationale for why the Town should include our client's lands for future residential development:	Comments noted.

Source	SUBMISSION	Response
	 Allows for the Town's initial consideration of rounding out of existing communities to accommodate projected growth and meet required housing demands; 	
	 Provides a moderate growth contiguous and closer to existing communities of Stewarttown and Georgetown that will reduce the financial burden for new community facilities and supports the efficient use of existing community facilities and commercial services; 	
	 The Town's priority for maintaining distinct communities and urban separators will not be compromised; 	
	 Will not undermine the Town's Community Strategic Plan goals and objectives in that a vibrant and unique upscale residential neighourhood could be planned and created on the subject lands that achieve a moderate scale of growth in keeping with the Town's urban and rural character; 	
	 Conforms with the growth objectives and policies of the Provincial Growth Plan, the Region's Official Plan and the Town's Official Plan for accommodating future growth; 	
	 The subject lands provide a reasonable alternative to accommodating future growth without negatively impacting continued viability of prime agricultural areas in Halton Hills. The subject lands do not compromise specialty crop areas; and, 	
	 Valuable resources such as Natural Heritage System and Mineral Aggregate Resources are not compromised. 	
	We understand that Town Council intends to hold a Special Council meeting on September 24 th to respond to the Region on the five Growth Options. Accordingly, we request that our client's 50-acre land be considered for inclusion in the urban area to allow the opportunity for appropriate community planning of an upscale neighbourhood to proceed.	
	We look forward to receiving your feedback on our submission and we are eager to working with the Region and the Town 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,	

Source	SUBMISSION	Response
	GLEN SCHNARR & ASSOCIATES INC.	
Glen Schnarr and Associates for Kaneff Properties	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	
September 22,2008	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 the 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 & 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 "Natural Heritage System" as they relate to the Royal Ontario Golf Club, to ensure these limits are consistent with those of the Greenbelt Plan.	The Region's consultants, North-South Environmental, have prepared a report that provides an implementation framework for the Natural Heritage System (see Sustainable Halton Natural Heritage System: Definition and Implementation (Report 3.02)). The NHS will be subject to further refinement through subsequent planning processes. The NHS will be released to Council and the public for review and comment.
	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 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.	The current limitations of boundary delineation is recognized and thus direction is provided to aid final NHS boundary determination that will continue to meet the goal and intent of the NHS as currently mapped. Final determination of the NHS boundary will occur through future sub-watershed studies, secondary plan studies or other site specific studies.
Goldberg Group for Ivanhoe Cambridge September 24,2008 October 23, 2008	Submission Dated September 24, 2008 Re: Sustainable Halton S/W/ Quadrant Highway 401 and Trafalgar Rd – 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 farm 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	See the letter received October 23, 2008, (directly following the September 24, 2008 submission). The respondent has relinquished its interest in the subject property.

Source	SUBMISSION	Response
	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	
	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.	A series of Technical Reports have been prepared to help inform decision making through Sustainable Halton and provide direction for policy development. Technical reports have been prepared on an updated urban land supply analysis (which includes details on intensification and densities), and the definition and implementation of the Natural Heritage System, among others. These reports are now available for public and stakeholder review and comment.
	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.	A meeting with Regional staff and Mattamy representatives took place in November 2008. As indicated above, the detailed studies are now available for public and stakeholder review and comment.
	 4.0 <u>Impact of Sustainable Halton on the Municipalities</u> 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.	Comments noted.
	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	Regional Council has endorsed an enhanced Natural Heritage System.

Source	SUBMISSION	Response
	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	Sustainable Halton is planning for conformity to the Provincial Growth Plan through more compact, complete community development.
	"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.	Achieving an activity rate for each of the Local Municipalities that reflects complete, balanced and sustainable communities was a key consideration when refining the Growth Concepts. The mixed-use/residential areas will be planned to accommodate services, employment uses and community facilities. This will include office and professional uses. Please see section 4.0 of <i>Report 3.08:</i> Working Paper #2: Concepts for Addressing Halton Region's Land Needs to 2031, by Urban Strategies Inc. [B]
	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."	We disagree. The refined Growth Concepts identify employment land needs to 2031, as determined in consultation with the Local Municipalities, and based on an updated land supply analysis by Hemson Consulting Ltd. (please see Report 3.07, Sustainable Halton: Accommodating Growth to 2031). The Region also recognizes the importance of protecting strategic employment lands beyond 2031 and will be providing protection through the Region's statutory five year Official Plan Review process.
	To date, we have attempted to engage the Region of Halton in	

Source	Submission	Response
	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 the questions and issues raised within our letter regarding these goals	A meeting with Regional staff and Mattamy representatives took place in November 2008. The minutes of this meeting have been attached as Attachment #1.
	No responses have been received on the remaining correspondence:	
	 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. 	
	 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.	
	6.0 <u>Balance</u>	
	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:	

Source	SUBMISSION	Response
	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.	

Source	SUBMISSION		Response
		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.	
	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	om 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	

Source	SUBMISSION	Response
	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 are within the "white belt" are situated in proximity to existing and emerging growth areas & growth centres including proximity to significant public infrastructure.	The Evaluation Framework is not designed to have one goal/objective assigned a higher priority than another. Rather, the Evaluation Framework is meant to assist the Region in testing Growth Concepts against the goals, objectives and measures of the Framework. Competing interests between objectives were anticipated. Through the Evaluation Framework, we are seeking robust discussions on the merits of the Growth Concepts leading to the selection of a preferred land use option that reflects the principles that are fundamental to planning in Halton.
	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 Regional Official Plan regards landform permanence as a fundamental value to land use planning in Halton Region. The Official Plan also states that the necessary steps will be taken to ensure that growth will be accommodated in a fashion that is orderly and manageable, yet sensitive to its natural environment, heritage and culture. Halton Region
	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	takes a holistic approach to sustainability through balanced decision-making. It is through this approach of balanced decision- making that the Region will be planning for the population and

Source	SUBMISSION	Response
	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.	employment forecasts of the Provincial Growth Plan, while also integrating the Natural Heritage System and a strategy of agricultural sustainability. The goal of the Sustainable Halton NHS is to provide a high degree of confidence that the biological diversity and ecological function of the Region of Halton will be preserved and enhanced for future generations, through the creation of a Natural Heritage System consisting of substantial core areas connected by multiple linkages, thus enhancing long-term integrity. With respect to the calculation provided regarding the total land area
		already identified for protection (stated as 58% of the entire regional land base, not including the proposed robust Natural Heritage System), the Region advises that this figure more accurately represents the total land area identified for protection including the lands that make up the enhanced Natural Heritage System (the Region is finalizing these calculations. They can be made available upon request).
	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"	The Region recognizes the significant protection provided by the Greenbelt. The Region's Natural Heritage System will provide a consistent level of protection to natural features across the Region and a high degree of confidence that the biological diversity and ecological function of the Region of Halton will be preserved and enhanced for future generations.
	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 <u>Densities/Land Budget/Balance</u>	

Source	SUBMISSION	Response
	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? 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.	The land budget of approximately 3,000 hectares shown on the Five Growth Concepts released in June 2008, reflected Scenario 3 of the Phase One Land Supply Analysis Technical Background Report completed by Hemson Consulting. Since that time, further analysis and updated information (including previously unavailable 2006 Census data and updated land capacity information), has resulted in updates to the land budget. Hemson Consulting has prepared a technical report detailing the updates to the land supply analysis in their report Sustainable Halton: Accommodating Growth to 2031 (Report 3.07). Hemson Consulting attended the meeting between Mattamy and the Region in November 2008.
	8.0 <u>Sustainable Infrastructure in Support of Planned</u> <u>Growth</u>	
	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 <i>sustainable</i> , we concur that infrastructure is a critical element in the decision making process. We note, however, that no initial or highlevel 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 Region is undertaking a financial assessment which will result in a high level analysis of the transportation and water and wastewater costs associated with the Growth Concepts. A detailed fiscal impact analysis will be undertaken for the preferred growth option. Economics is one of the factors being considered in the evaluation of growth option through the fiscal impact analysis. [A]
	The early development of engineering constraints and opportunities is particularly important for the following reasons:	

Source	SUBMISSION	Response
	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.	
	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.	
	9.0 <u>Financial Implications of Emerging Options</u>	
	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.	See previous response. [A]
	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.	The Region's Development Financial Plan Framework (CS-73-08/PWE31-08) sets out how the Region will finance the servicing of employment and residential land in Halton Region. The financing of employment land should not impact on how the Region finances residential led development.

Source	SUBMISSION	Response
	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. 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.	See response to section 11.0
	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.	
	10.0 <u>Live/Work Balance</u>	
	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	Please refer to previous response in section 4.0 regarding activity rates. [B]

Source	SUBMISSION	Response
	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. 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).	The Highway 401 and Highway 407 corridors have been identified as important locations for employment, particularly for employment uses that depend on easy access to the transportation network. However, as mentioned previously, the mixed-use/residential areas will also be planned to accommodate employment that will be more integrated within the surrounding community. As well, both employment and mixed-use/residential uses are proposed for the area surrounding the potential GO Transit station in east Milton to encourage and promote public transit use.
	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 Milton, the CP intermodal facility south of Highway 401 or lands controlled by C.N. in the south-west quadrant of Milton.	Hemson Consulting Ltd has completed an updated land supply analysis. Based on additional detailed analysis (which included previously unavailable 2006 Census data), as well as further analysis of the type of employment development occurring in Halton, the employment land needs has been increased to a

Source	SUBMISSION	Response
	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 the 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.	total of 1,100 hectares. The detailed land supply analysis can be found in <i>Report 3.07: Sustainable Halton: Accommodating Growth to 2031</i> by Hemson Consulting Inc. Included as part of the 1,100 hectares is approximately 200 hectares along Tremaine Road in south Milton adjacent to the rail line, and lands along Highway 407 in east Milton.
	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.	Through the Town of Milton staff report PD-076-08, dated September 22, 2008, Milton Council resolved to keep these lands as employment as designated in the current official plan. Thus, a redesignation from employment to residential is not contemplated and has not been considered in the refinement of the Growth Concepts.
	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.	See above response.
	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.	Not all lands identified with the highest potential for supporting new employment uses are needed to meet the Region's land needs to 2031. The Region recognizes the importance of protecting strategic employment lands beyond 2031 and will be providing protection through the Region's statutory five year Official Plan Review process.
	12.0 <u>Natural Heritage System; "Environment First";</u> <u>Balance</u>	
	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	See previous response to section 6.0 on page 136 regarding the Region's holistic approach to sustainability through balanced decision-making.

Source	SUBMISSION	Response
	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 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? 	The Region takes a holistic approach to sustainability through balanced decision-making that takes into account the social, economic and environmental implications of decisions.
	 Is such a substantial Natural Heritage System ("NHS") implementable? What are the lost opportunities should this decision be made? 	Regional Council has endorsed an enhanced Natural Heritage System. The Region does not feel that the Natural Heritage System compromises the Region's ability to develop compact, balanced and complete communities.
	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 Region does not feel that the Natural Heritage System will create fragmented communities. In fact, through Sustainable Halton, the Region is planning for more compact communities. Please also note that the Natural Heritage System has undergone a number of refinements based on comments received (please refer to the technical report, Sustainable Halton Natural Heritage System Definition and Implementation (Report 3.02)).
	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	The Region recognizes the significant level of protection afforded by the Greenbelt, but also recognizes the important function of the natural features that make up the natural system across the Region. As described above, the Region takes a

Source	SUBMISSION	Response
	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.	holistic approach to decision-making that takes into account the social, economic and environmental implications of decisions.
		The development of the Natural Heritage System has been documented in the technical report, Sustainable Halton Natural Heritage System Definition and Implementation (Report 3.02), by North-South Environmental. In response to comments received on the Natural Heritage System (NHS), and in consultation with the Sustainable Halton Working Group (comprised of Regional staff, Local Municipal Planning staff, Public Agency staff, and the Province), the Halton Agricultural Advisory Committee, and the Halton Ecological and Environmental Advisory Committee, the Natural Heritage System has undergone a number of refinements. The Region's consultants, North-South Environmental, have prepared a report that provides an implementation framework for the Natural Heritage System. Final determination of the NHS boundary will occur through future sub-watershed studies, secondary plan studies or other site specific studies.
	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	

Source		SUBMISSION	Response
		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).	The NHS is an environmental protection strategy that moves beyond a "features-based" approach, as such it is treated as a single tier system
		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;	The Natural Heritage System has been developed at a regional scale with a defined set of best available data (see Appendix 3 of the report, Natural Heritage System: Definition and Implementation (Report 3.02), which describes the Metadata used). NHS development has largely been a desktop exercise aided by GIS analysis of the available data. The
		what is more useful is to define the functions, features and linkages (both earth and life science	available digital data was plotted on 1:10,000 maps and overlays were

Source	SUBMISSION	Response
	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.	created to assist in the identification of core area enhancements, centres for biodiversity and linkages.
	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 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.	Please refer to the technical report prepared by North-South Environmental, Sustainable Halton Natural Heritage System Definition and Implementation (Report 3.02).
	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)	Please see Figure 1 as Attachment #2 to this document.

Source	SUBMISSION	Response
	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.	Within the existing urban boundary, existing Official Plan designations will be used to define the NHS.
	14.0 <u>Policy Basis of NHS is flawed</u>	
	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 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:	

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	"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.)	See previous response in section 6.0 on page 136.
	15.0 <u>Georgetown</u>	
	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.	The refined Growth Concepts presented in <i>Report 3.08: Working Paper #2: Concepts for Addressing Halton Region's Land Needs to 2031</i> , by Urban Strategies Inc., generally rely on concession roads to define the limits of the new urban boundary. These boundaries are subject to change and will be refined once a preferred option is selected.
	16.0 <u>Alternative Sustainable Halton Structural Land Use</u> Concept	Please find Figure 2 as Attachment #2 to this document
	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.	The lands identified on the Mattamy Growth Scenario as mixed use/residential are being considered as part of one or more of the refined Growth Concepts shown in <i>Working Paper #2</i> . The evaluation process, using the evaluation framework, is
	Generally described, this Growth Scenario proposes some additional residential and employment lands in Halton Hills, representing a logical extension to existing or approved land	being used to evaluate the relative merits of proposed locations for new urban lands.

Source	SUBMISSION	Response
	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.	The suggestions for locations for new employment lands also closely match the areas proposed as new employment lands in each of the refined Growth Concepts. The exception is the lands south of the Milton Rail corridor, which are being proposed as mixed-use/residential to support the proposed GO Transit Station and transit oriented development in the area. These lands are envisaged as being a good location for a mix of higher density residential, office, community and community uses, provided that land
	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 emphases the requirement and need for a more "balanced" approach. It is only through such an approach will sound land use decisions be formulated.	use compatibility is assured
	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	
	Supporting technical reports:	
	Comments Regarding Sustainable Halton Initiative – Savanta (December 23, 2008)	
Destination Campbellville Community Association	Att: Sustainable Halton Growth Management Team Re: Campbellville Business and Future Growth - Input Regarding Growth Options	
September 29, 2008	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	

Source	SUBMISSION	Response
	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.	Comments noted.
	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.	The Sustainable Halton process is the Region's growth management initiative to achieve conformity with the Provincial Growth Plan. Through Sustainable Halton, future urban growth areas will be identified to accommodate population and employment growth from 2021 to 2031. The Hamlet of Campbellville is not located within the Sustainable Halton Primary Study Area (the area within which new urban areas will be designated to accommodate future growth between 2021 and 2031) and as such, is not being considered for future growth through the Sustainable Halton process. However, there may be opportunities outside of the Sustainable Halton process to pursue hamlet expansion, subject to applicable planning policies.
	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	Any request for hamlet boundary expansion would have to be dealt with in the context of the applicable planning framework (which depending on the location of the hamlet, could be subject to the policies of the Niagara Escarpment Plan, the Greenbelt Plan, the Regional Official Plan, and the

Source	SUBMISSION	Response
	inclusion of Campbellville is necessary and would reinforce the notion that a complete community is important to the Sustainable Halton document.	applicable Local Official Plan).
	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.	While Sustainable Halton is not the appropriate initiative within which to consider hamlet expansion, Halton Region and the Town of Milton are both undergoing an Official Plan Review process. As part of this review, the official plans are being brought into conformity with the Provincial Greenbelt Plan. The hamlet policies of this plan permit a minor rounding out of the hamlet boundary at the time of municipal conformity, that is in keeping with the character of the hamlet. You may wish to bring forward your request for consideration through the Region or Town's Official Plan Review process. A meeting with Regional and Town of Milton planning staff is recommended.
	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.	

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	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.	
East Milton Land Owners Group September 29, 2008	Introduction The following brief has been prepared by Procepts Ltd. for the "East Milton Landowners Group" who represent a sizeable portion of the lands in the area which is bounded to the north by the C.P.R., west by Trafalgar Road, to the east by 8th Line, and south to Highway 407. This area will be referred to as "East Milton".	
	The purpose of this "Brief" is to formally respond to "Sustainable Halton: Working Paper #1: Location Urban Land", that was released by the Regional Municipality of Halton in the summer of 2008. The contents of this "Brief" include:	
	A list of "Key Observations and Concerns" identified by the "East Milton Landowners Group" and a reasoning of the importance of these concerns as they affect both economic growth strategies and development decisions for this area;	
	2. An identification of "Key Issues" that have arisen as a	

Source	SUBMISSION	Response
	result of a research, study and consultation on the suggested "Refined Concepts" outlined and put forth in the "Working Paper";	
	3. "Reasons" for support of a New Refined Plan as discussed during the public consultation process which addresses the significant planning differences between Milton and Georgetown, more specifically, a plan which would exploit the available high order infrastructure south of the 401; and	
	4. A "Summary of Recommendations" resulting from the work and consultation process undertaken by Procepts Ltd. with members of the "East Milton Landowners Group", and from the participation of Procepts Ltd. principals in the public consultation process.	
	Summary of Recommendations	
	As a result of our review of the "Working Paper", more specifically, the Five "Refined Concepts", and in addition to participation in the working sessions during the public consultation, we would respectfully recommend:	
	1. That new development to 2031 should be allocated to the 401 south Milton Study Area, in particular, the East Community as the optimum development area. The Town of Milton and its environs must be understood as a distinct planning area that is defined by the GTA's infrastructure pattern - an area significantly different than the lands north of the 401. Further, we support the Town Of Milton Report PD-076-08;	Within Milton the growth concepts identify new employment and mixed use residential lands including portions of the East Milton Landowners Group lands.
	2. That the configuration of the <i>Natural Heritage System</i> be reviewed and reflect current approvals. In addition, that all lands that are currently used for urban related purposes should be recognized, including golf courses, and that the land parcels in the proposed and future potential sub-community expansion areas, not be unduly fragmented. It is our view that <i>natural heritage systems</i> should delineate systems of a natural character and not those which are man-made;	The current limitations of NHS boundary delineation are recognized and as such, direction is provided to aid final NHS boundary determination that will continue to meet the goal and intent of the NHS as currently mapped. Final determination of the NHS boundary will occur through future sub-watershed studies, secondary plan studies or other site specific studies. The determination of the NHS boundary will occur in concert with the application of Smart Growth/Complete Community development planning and decision-making that will integrate NHS

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		refinements into detailed land use plans (e.g., secondary plans). The preparation of detailed land use plans will allow final NHS boundary determination to take advantage of additional natural heritage information and analysis that will be available from the associated detailed field studies. [A]
	3. As an adjunct to this work, the Regional Municipality of Halton should establish a mature state "vision" for the Region by preparing a comprehensive urban development plan to efficiently manage and accommodate urban expansion beyond the "Places to Grow" (2031) targets. It is our experience that a twenty year timeframe to complete development and the ultimate occupancy of such proposed master planned communities is a relatively short period;	Places to Grow requires the Region to plan for the population and employment targets to 2031, and not beyond 2031.
	That the Refined Plan should incorporate an additional 1,800 hectares of retail and employment land;	The Region's land needs analysis has been further refined. For the details please refer to <i>Report 3.07</i> , entitled <i>Sustainable Halton: Accommodating Growth to 2031</i> by Hemson Consulting Ltd.
	5. Further detailed studies concerning the financial impacts of phased growth should be initiated. These studies should include and clarify where economies of scale could be achieved for the longer term development of identified sub-communities; and	The Region is undertaking a financial assessment of the Growth Concepts. A detailed fiscal impact analysis will be carried out on the preferred growth option once selected by Council. [B]
	6. That the Region should make every effort to secure and take full advantage of the post secondary educational opportunity now emerging to strengthen Milton's distinctive identity while fostering job growth in the knowledge based sectors of the Ontario economy.	The Growth Concepts all identify the Milton Education Village.
	Key Observations and Concerns	
	In initiating the process of responding to, and working towards a reply to the "Working Paper", a number of "Key Observations" were made and "Key Concerns" identified that governed the Groups' discussions and which ultimately effected the recommendations made in this brief.	
	The Group is appreciative for the opportunity to review all the	

Source	SUBMISSION	Response
	background studies and to participate in the working sessions over the past two weeks. Arising from this work, we have come to recognize the very special place Milton occupies in the fabric of the GTA and the exceptional opportunity unfolding within our Region. It is from this vantage point that we offer the following:	
	The Refined Concept must recognize and emphasize its geographic inter-relationships and the effects of regional market forces:	
	Halton Region is part of a larger geographic and economic growth area that includes other successful abutting urban settlement regions within Ontario and the U.S.,	
	 b. Milton's urban areas are located adjacent to the strongest and most rapidly growing economic areas in Ontario. While Milton's prosperity has been historically tied to the high quality of adjoining agricultural land, it must recognize that in the future, its prosperity will flow from its adaptation of knowledge based industries and from its proximity to Toronto, the eighth largest world financial centre; 	
	c. Proximity to Pearson Airport and the related job development around the country's major transportation facility, are major reasons to commence economic development and stimulate job creation along the 401/407/403 corridors that extend through Halton Region;	The Growth Concepts include 1,100 ha of employment located along the Highway 401 and 407 corridors, and along Tremaine Road in south Milton adjacent to the rail line.
	d. Development within the GTA is located within a matrix of "super blocks", structurally framed by the region's #400 series expressways. The Milton "block", south of the 401, is the last remaining significant and greatly undeveloped area within the entire GTA; (Map One)	
	e. In all three concepts (five plans), growth is located either south of the 401, or in two different arrangements north and south of the 401. In our view, the planning context south of the 401 is, in all aspects, radically different compared to the lands north of the 401 in Halton Hills and Georgetown. These lands should, therefore, be planned independently;	We disagree that all future employment lands should be planned independently. We feel we must take a holistic approach and ensure that equal consideration is given to all future employment areas in the Region to ensure the development of complete, healthy and sustainable communities. The evaluation process, employing the evaluation framework, will evaluate the relative

Source	SUBMISSION	Response
	f. Owing to the confluence of the #400 series Highways and major rail links at Milton, it must be	merits of proposed locations for new urban areas.
	recognized that Milton is the primary G <i>ateway to the GTA</i> from southwestern Ontario; (Map Two)	
	g. With future job growth stemming mainly from the knowledge based sector of the Ontario economy, it should be <i>noted</i> that Milton is not only centrally located, but that it is within a thirty mile radius of six major Ontario universities and numerous community colleges. However, the Region itself is home to no university;	
	 Milton is the closest GTA location to international border crossing points which access the United States through Michigan and New York; and 	
	i. The network of valley lands within the Milton Block presents the Region with an expansive canvass upon which to plan a very dynamic and pleasing community which is rich in open space and that can offer a wide variety and range of housing accommodation, (configuration and density), that are all linked by the NHS.	
	2. The East Milton Lands are partially mischaracterized. The lands are used for existing urban fringe uses rather than farmland, and the NHS mapping south from Britannia East of Trafalgar is inaccurate. This causes unnecessary fragmentation and incorrectly assumes unproductive and inefficient servicing costs while weakening linkages:	Please see response [A] to Recommendation #2.
	 Much of the land South of Britannia and East of Trafalgar depicted as NHS is the subject of a development agreement which has delineated the NHS in a pattern significantly different than that depicted in the Working Paper; 	
	 The Working Paper overstates the actual NHS impact on the Trafalgar and Britannia Corridors. Consequently, it unduly prejudices realization of infrastructure optimization, urban system nodes and corridors, agricultural preservation and employment goals; 	

Source		SUBMISSION	Response
	C.	Land uses within the East Milton area reflect urban fringe activities such as golf courses, market garden and green house operations, estate housing, equipment supply and contractor yards. These lands are already largely urbanized, but at a low intensity. Long term redevelopment of these lands within the 2031 timeline, is, therefore, consistent with the stated goals of the work program;	
	d.	While development of the lands within the Milton Block and the East Milton Community make sense because of the quality of development in terms of NHS protection and distinct community goals, the focus should be on urban design considerations which should be addressed in subsequent phases of the project.	Urban design considerations will be addressed by the Town of Milton as part of their future planning processes.
	wit Th pro	e infrastructure development costs associated the expansion must become a major consideration. is cost analysis must be integrated into the ocess which is responsible for preparing the final fined concept;	A high level financial analysis of the impact of transportation and water and wastewater infrastructure associated with the refined Growth Concepts will be conducted and will
	a.	It should be noted that the Milton East Community can be serviced from existing and planned infrastructure with comparatively minimal NHS impact. In addition, it is the least cost infrastructure expansion option offering high efficiency in the use of existing hard and soft infrastructure and utilities;	demonstrate at a high level, the costs of the Growth Concepts to assist in decision making towards the selection of a preferred land use option. The Water and Wastewater Master
	b.	The savings in municipal related capital projects is a beneficial consequence not only to those who will work and live in the Milton East Sub-Community, but also to all taxpayers of Halton Region and their local municipalities;	Plan will be updated to 2031 after a preferred Growth Option is selected by Council. If these lands are included in the preferred Growth Option, then the Water and Wastewater Master Plan will identify
	C.	Water service has been proposed by the Region to proceed from North Oakville on an alignment along Trafalgar Road thus providing water to the Milton East sub-community. Various pressure zones will determine the outest of worker	a servicing strategy for servicing these lands. It is also noted that the evaluation framework does include consideration for making the best use
	d.	determine the extent of works; The sanitary sewer connections which would service the East Milton Sub-Community can be organized through the over-sizing of sewer lines and pumping stations that are envisioned for servicing the already designated employment lands of Business Park 2. The East Milton Sub-Community would connect to a planned pumping station half way between Derry	of existing infrastructure under the theme of ensuring sustainable infrastructure to support growth. However, infrastructure servicing considerations are only one component of the overall evaluation framework for Sustainable Halton. Through PPW42-08, the Nine Initial Concepts, including Concept #9 - Milton East, were assessed to

Source	SUBMISSION	Response
	and Britannia Roads along the St. Laurent Mid Block Collector as proposed in the 2008 MPCL; e. Halton Region is currently developing the road corridor system by providing a four lane network on Derry and Trafalgar Roads. This lends itself well to effective residential development to the south of the employment corridor with a focal point at Derry Road and the recently upgraded Trafalgar Road intersection and to the GO transit line; and f. The availability of utilities along the Trafalgar corridor should also be an infrastructure consideration	develop the short list of growth concepts. The three concepts that are currently being evaluated using the evaluation framework include Concept 1 - Milton Centred, Concept 2 - Milton and Georgetown Growth to 20,000 people, Concept 3 - Milton and Georgetown Growth to 40,000 people.
	4. The current planning program underestimates the positive employment and social impact of the planned post secondary project in strengthening Milton's identity	See previous comments regarding the Milton Education Village
	a. Universities are "Knowledge Creators" and are the indispensable players in the advancement of scientific knowledge, which continually seed new generations of applied research, scientific breakthroughs and streams of new products. They play a central and strategic role in educating and training the scientists, teachers, researchers, entrepreneurs and other skilled workers that fuel innovation in high technology and the knowledge industries that are the primary drivers of successful regional economies today. Universities create employment and fuel long term sustained economic regional growth; and	
	 Universities significantly contribute and impact a region's quality of life, providing access to diverse activities that have implications on ancillary economic and community life, while contributing to a community's already established identity; and 	
	 Milton has been pursuing a University presence since 1994. 	
	5. We agree with the recommendation in the earlier Hemson studies of using the high range of the 4,200 hectare area to accommodate emerging market opportunities:	
	a). The Sustainable Halton Study determined that there was a proposed range of between 3,000 to 4,200	

Source	SUBMISSION	Response
	hectares that could be dedicated for expansion growth, with 600 hectares for employment uses in either case. The lower amount of new urban land at 3,000 gross hectares is based on achieving the provinces target of accommodating 40% of new housing development within existing areas by 2015. Therefore, the larger amount is required if the 40% target is not accomplished within the next 5-6 years;	The Region's land needs analysis has been further refined through an updated land supply analysis by Hemson Consulting Ltd. For further details, please refer to <i>Report 3.07</i> , entitled <i>Sustainable Halton:</i> Accommodating Growth to 2031 by Hemson Consulting Ltd.
	b). The "Working Paper" suggests only 3,000 hectares be dedicated for expansion growth on the assumption that "other Urban Uses" which typically and historically have assumed 30% of the urban area will, through intensification, be reduced to 20%. The major concern is that with no supporting documentation, utilizing the suggested minimum number of only 3,000 hectares would offer very little flexibility for future development and expansion and retard the ability of the Region to provide the vary range of private amenities, institutions, and retail which form the very basis of the "Vision" statement;	The Region is planning for new growth areas that will reflect the principles of complete community development. For further information on the characteristics of future development, please refer to <i>Report 3.08, Working Paper #2: Concepts for Addressing Halton Region's Land Needs to 2031</i> , by Urban Strategies Inc. Please also refer to the Hemson report noted above for details on the updated land supply analysis.
	 c). By only utilizing the minimum amount of hectares, there is a possibility, and even a strong probability, that this would lead to an eventual lack of availability of employment lands, especially as present employment lands in Mississauga and Brampton are developing at a very rapid pace; and d). The Group strongly believes that in order to support a strong Ontario economy and to benefit locally from regional economic growth in this area, Halton Region must position itself more favourably to better allow it to compete for major investments by providing timely availability of land. 	Through statutory five year Official Plan Reviews, the Region will investigate whether the designated urban lands are sufficient to accommodate the population and employment projections for the life of the Official Plan.
	6. That starting from the already evident financial advantage of developing the Milton East Community, Halton Region should examine the financial aspects and concerns of phasing growth, where economies of scale are essential for infrastructure development for the longer term:	
	a) The discussion of the original nine concepts and the present selection of the "Three Refined Concepts" must recognize and fully appreciate the importance of the economic implications that arise from the	We feel that the Growth Concepts do recognize the Region's geographic relationships with our neighbours with the focus of employment lands along

Source		Submission	Response
		Region's geographic relationships with its neighbours;	the Highway 401 and 407 corridors.
	b)	The "Refined Concepts" artificially and unnecessarily provide a mutually exclusive choice between development of the East Milton Sub-Community or the expansion of the Georgetown Sub-Community;	We disagree and feel they are reflective of holistic approach. The refined Growth Concepts contained in Working Paper #2: Concepts for Addressing Halton Region's Land Needs to 2031 (Report 3.08), by Urban Strategies Inc., are not intended to be mutually exclusive and may ultimately be a combination of the best of each Concept.
	c)	The prioritizing of the south and southeast Milton area is inappropriate because this option only responds to the issue of immediate sewer servicing and not to water and transportation issues. Furthermore, it entirely ignores that the strongest growth pressure in Halton is nearer the Highway 401/407/403 corridors;	Working Paper #2 notes that the refined Growth Concepts have been modified to make best use of existing and planned infrastructure along the Trafalgar Road corridor in east Milton. We feel that the Growth Concepts recognize the Region's geographic relationships with our
	d)	Locating residential and mixed urban uses in south and southeast Milton, while seeming to be appropriate in some areas, should not be made a priority over the lands located in the East Milton Sub-Community	neighbours with the focus of employment along the Highway 401 and 407 corridors. The evaluation process, using the evaluation framework, will assess the relative merits of potential new urban areas in Milton and Halton Hills.
	of .	Iton Region should move towards the development a mature state vision that incorporates the current laces to Grow" targets and timeline	Through statutory five year Official Plan Reviews, the Region will investigate whether the designated urban lands are sufficient to
	a)	If the Refined Concepts were to consider a mid- range of 3,600 hectares (3,000 hectares for residential and mixed-use urban) and an upper-end concept of 4,200 hectares as the Sustainable Halton Studies suggest, it would raise other, appropriate and less limiting options, like greater employment land areas etc.;	accommodate the population and employment projections for the life of the Official Plan. The Provincial Policy Statement permits municipalities to designate only up to 20 years of urban lands.
	b)	At a minimum, this approach offers the opportunity to review and consider the most cost effective expansion, thus leading to better attainment of planning goals as set out in the "Halton Regional Plan" and as guided by the objectives of the Province's "Places to Grow" (2006) and the "Provincial Policy Statement" (2005); and	
	c)	The lower-end of the range with only 3,000 hectares assumes the greatest level of intensification, the greatest shift in housing type, and a reduction in the	The Region will be achieving the minimum 40% intensification target

Source	SUBMISSION	Response
	ancillary use factor from 30% to 20%. This has the effect of constraining not promoting a range of housing and community design options.	required by Places to Grow. It does mean a shift in housing preferences but the Region feels that is achievable.
	2. Key Issues The results of study and discussion of the Group's "Key Concerns", led the Group to formulate a number of "Key Issues" that it feels it needs to both present, and await a response from both municipal and regional authorities. These issues are itemized as follows: 1) The Primary Study Area is composed of two distinct sub areas. Growth centred in the Milton Block and expansion of the Georgetown Community are two totally separate planning challenges which have coincidentally merged. These planning challenges need to be addressed separately;	We disagree. The challenge is to accommodate the population and employment targets of Places to Grow and the Region must apply a consistent and holistic approach.
	2) Focus development on existing infrastructure and utilities. Given that the Refined Concepts will only add 3,000 hectares of urban land, to maximize the attainment of community goals, Halton Region should prefer to see the development of the "East Milton" lands over those of other subject land areas;	Utilizing existing infrastructure is just one element to be considered. The Region is focusing on creating complete, healthy and sustainable communities as is evident in our Evaluation Framework.
	3) Realisation of critical density assumptions in the short term by 2015. The 3,000 hectare option is a radical option which requires the greatest change in intensification and greatest change in housing type requiring the least amount of land through a 40% intensification shift by the year 2015. Given that earlier studies, "Sustainable Halton" justified expanded urban growth areas in a range of 3,000 to 4,200 hectares, the final concept should offer choices regarding densities, location and timing, which utilize a middle to high end area amount versus the presently suggested 3,000 hectares. The key issue is to develop a plan that responds to immediate and long term market issues which in turn respond to, but are not led, by the Province's "Place's To Grow" document;	Provincial legislation requires conformity. The Region is preparing a plan that best meets its needs and the policies of Places to Grow. The report by Hemson Consulting Ltd. entitled Sustainable Halton: Accommodating Growth to 2031 (Report 3.07) provides the details with respect to the Region's land needs.
	4) Inability to evaluate options absent a Financial Plan. A capital cost analysis of the refined development option(s) must be completed as part of the next step of the plan development process. This analysis should clearly identify what variations of infrastructure are required to satisfy the associated growth concept(s);	See previous comment [B] to recommendation #5.

Source	SUBMISSION	Response
	 5) Accurate Base Condition Characterisation. The extent of the <i>Natural Heritage Systems</i> must be justified and further detailed. The "East Milton" existing urban fringe land uses be reflected in the base condition mapping upon which concepts are prepared and evaluated; 6) Take advantage of Milton's strategic location. It must be recognise that the Milton Block (Milton, 401, 407/403) is strategically located, largely serviced and most importantly, poised to take advantage of emerging market opportunities, which, if harnessed properly, will underwrite the Region's environmental and quality of life goals for decades to come. In addition, the westward migration of the "Toronto" urban fringe over the past 100 years, to its current boundary adjacent to Milton repositions Milton's future market position as the western gateway to the GTA. 	In response to comments received and in consultation with the Sustainable Halton Working Group, the Sustainable Halton Natural Heritage System has undergone a number of refinements. The Region's consultants, North-South Environmental, have prepared a report that provides an implementation framework for the Sustainable Halton Natural Heritage System (Report 3.02: Sustainable Halton Natural Heritage System Definition and Implementation). The NHS will be subject to further refinement through subsequent planning processes. This report will be made available to Council and the public for comment. Comment noted.
	 Reasons for the Support of Milton's Refined Concept The East Milton Sub-Community Infrastructure Corridor Best Meets "Halton Region" Employment Land Needs: Giving East Milton priority development most adequately responds to the demands of the Highway 401 employment lands, in addition to lands adjacent to Highways 403 and 407. This corridor of land, running adjacent to Highway 401, has a combination of attributes for employment expansion that is unique in north Halton Region. It: a) offers direct visual impact and exposure to potential employment uses, 	See previous comments to section 6 of the submission.

Source	SUBMISSION	Response
Source	b) has nearly 20 miles of existing highway frontage, c) has high capacity electrical power available throughout its entire length, not to mention available uses of lands under the power lines, d) can be serviced by excellent direct rail service to industrial sites from the CP main line, e) abuts an existing and growing inter-modal facility that includes truck and rail cargo handling, f) is close to and has optional highway access routes to Pearson Airport, g) is the new western gateway to the GTA, and h) will be serviced by an expanding GO Transit Service. No other potential employment land area in northern Halton Region has these potential investment attributes. Further, these lands meet all of the criteria as set out by the Province of Ontario for employment land in its "Places to Grow" (2006) and Provincial Policy Statement (2005). 2. The East Milton Sub-Community Offers Excellent Potential for Expansion of Milton Residential and Related Urban Uses. While residential location requirements are more diverse and flexible, the development of the East Milton Sub-Community should be favoured for the following reasons: a) We are in a period where good/green planning is attempting to promote shorter and better journey-to-work relationships. The East Milton Sub-Community is simply the most centrally located of any of the possible areas for residential expansion. In terms of road-time-travel, it is the closest to: i. The expanding employment areas in Brampton,	These comments will be referred to Milton staff who will be assisting the Region in selecting the preferred Growth Concept and Option.
	Mississauga, and the existing area of Milton through easy access to Highways 401 and 407, ii. The employment area approved in the North Oakville plan,	
	iii. The potential employment areas within the East Milton Sub-Community itself, and	

Source	SUBMISSION	Response
	 iv. In addition, the Sub-Community is equally, or better positioned, for a short journey to work to the neighbouring proposed Milton employment area (Business Park II) lying south of Highway 401 and along the James Snow Parkway; b) GO rail service is already committed to provide direct regional transit service to downtown Mississauga, downtown Toronto, and downtown Milton. This service is not possible, at this time, for the residential development areas of south Georgetown; and 	
	c) The regional road network integrates the Milton East Sub-Community into Milton and easterly to neighbouring Mississauga. Current construction will see the completion of Derry Rd. from the James Snow Parkway to 9th Line. This will provide residents exceptional access to a full range of commercial, institutional and recreational uses that are the pillars of community life. Trafalgar Rd has been expanded to four lanes offering alternative north- south travel while easing access to Highways 401 or 407.	
	 3. East Milton Sub-Community is the Least Cost Infrastructure Expansion Option: The infrastructure development costs associated with expansion must be an essential consideration and should be integrated into the selection process prior to forming the final sets of alternatives. On the basis of our investigations, the development of the East Milton Sub-Community represents the least costly approach to urban growth and offers the highest efficiency in the use of hard and soft infrastructure: a) Water service has been proposed by the Region to proceed from North Oakville on an alignment along Trafalgar Road, thus providing water to the Milton East sub-community; b) The sewer connection to service the East Milton Sub-Community can be organized through the "oversizing" of sewer lines and pumping stations that are envisioned for servicing the already designated employment lands of Business Park 2; 	Economic viability is one of the factors being considered in the evaluation of Growth Concepts. If these lands are included in the preferred growth option for Sustainable Halton, then the Halton Water and Wastewater Master Plan will identify a servicing strategy for servicing these lands.

Source	SUBMISSION	Response
	c) The East Milton Sub-Community would connect to a planned pumping station half way between Derry and Britannia Roads and would entail a minimum dead run of sewer to reach Trafalgar Rd.; and	
	d) Halton Region is currently developing the road corridor system by providing a four lane network on Derry and Trafalgar Roads. This lends well to effective residential development to the south of the employment corridor with a focal point at Derry Rd and the recently upgraded Trafalgar Rd intersection and the GO transit line.	
	4. East Milton Sub-Community and Planning Assumptions in the Long Term:	
	It must be expected that any process of urban development planning must include a degree of flexibility so as to be able to respond to unexpected events during the time frame of the plan. In addition, such flexibility would also allow for responsible planning for the long term or even beyond the current planning horizons. Therefore	
	 a) As growth within the Greater GTA core proceeds, it will, at some point, exceed targets set in the "Places to Grow" Growth Plan. Therefore, more than the minimum "Future Urban Area" identified in the Working Paper will have to be programmed for urban development; and 	The statutory five year Official Plan Review is the Region's opportunity to review its policies and propose changes if the need is justified. The Provincial Policy Statement permits
	 b) If scaled appropriately, over-sizing of the sewer conveyance system and water supply lines pursuant to our previous remarks would minimize the further incremental cost of extending lake based services. This would extend services to Georgetown and permit removing the town's reliance on well water and the use of upstream tributaries of the Credit River for effluent conveyance; 	municipalities to designate urban areas only to up 20 years. Master Plans will be updated after a preferred land use option is selected by Council.
	4. Summary of Recommendations	
	The following series of "Recommendations" by the East Milton Landowners Group are proposed to local and regional authorities for their consideration and response.	The following recommendations have been addressed in the previous
	That new development to 2031 should be allocated to the Highway 401 South Milton Study Area. In particular, the	responses to this submission.

Source	SUBMISSION	Response
	East Community as the optimum development area. The Town of Milton and its environs must be understood as a distinct planning area that is defined by the GTA's infrastructure pattern - an area significantly different than the lands north of the 401. Further, we support The Town Of Milton Report PD-076-08;	
	2. That the configuration of the <i>Natural Heritage System</i> be reviewed and reflect current approvals. In addition, that all lands that are currently used for urban related purposes should be recognized, including golf courses, and that the land parcels in the proposed and future potential sub-community expansion areas, not be unduly fragmented. It is our view that <i>natural heritage systems</i> should delineate systems of a natural character and not those which are man-made;	
	3. As an adjunct to this work, the Regional Municipality of Halton should establish a mature state "vision" for the Region by preparing a comprehensive urban development plan to efficiently manage and accommodate urban expansion beyond the "Places to Grow" (2031) targets. It is our experience that a twenty year timeframe to complete development and the ultimate occupancy of such proposed master planned communities is a relatively short period;	
	 That the Refined Plan should incorporate an additional 1,800 hectares of retail and employment land; 	
	 Further detailed studies concerning the financial impacts of phased growth should be initiated. These studies should include and clarify where economies of scale could be achieved for the longer term development of identified sub-communities, and 	
	6. That the Region should make every effort to secure and take full advantage of the post secondary educational opportunity now emerging to strengthen Milton's distinctive identity while fostering job growth in the knowledge based sectors of the Ontario economy.	
Maple Grove	Dear Sir/Madam:	
United Church	RE: Sustainable Halton	
September 29, 2008	I am writing on behalf of a specific proposal that supports the principles set out in the Planning Vision for Halton.	

Source	SUBMISSION	Response
	Maple Grove United Church at 346 Maple Grove Road in Oakville, wishes to use a portion of its rear lands adjacent to the Oakville Trafalgar High School to develop a Life Lease Housing for adults over the age of 60 years.	This is a matter of zoning and urban design and will be referred to the Town of Oakville for their consideration.
	At present in East Oakville if someone determines that they must or wish to downsize they must move out of the area. There is little or no accommodation for independent living.	
	The use of the Church land for Life Lease supports the concepts of a liveable community; reduced sprawl and making better use of existing infrastructure as outlined in Sustainable Halton and will serve as an example of how the concepts can be incorporated into the existing infrastructure using new planning initiatives.	
	Thank you for your consideration and the opportunity to make you aware of the project as we move forward to secure zoning approval.	
Bousfields Inc. for Trelane Inc. September 29, 2008	Re: Trelane Inc., West ½ Lot 14 Con VII, N.S. Milton We are consultants to Trelane Inc., owners of the captioned land, a 37.1 ha (91.7 ac) which fronts on the south side of Highway 401, municipal address 7585 Sixth Line in the Town of Milton. (See Figure 1.) Accordingly, we have followed the evolution of the 'Sustainable Halton' planning program, noting that the 'Nine Concepts', and subsequently the 'Five Concepts' proposed an "Employment Lands" designation on the easterly part of the site, and a "Natural Heritage" designation on the western end. We were in attendance at the Milton Council meeting on September 22nd at which Staff report PD-076-08 was adopted as the Town's response to the circulation of the Five Concepts. (See Figure 2 attached.) It will be observed that the designation shown on the Trelane lands reflect the 5 Concepts. However, along its east boundary, the Town has introduced the establishment of an extensive Mixed Use Retail/Transit Node centred on a new GO station where the CPR crosses Trafalgar Road. On behalf of Trelane, we seek your favourable consideration of the following proposals, for the reasons stated: 1. Re Urban Land Use Designations	The referenced property is located with frontage along the Highway 401 Corridor. This frontage has been identified as the first priority for new employment lands, as supported by the report Urban Structure: Potential Long-term Growth Areas by Hemson Consulting, and further supported by the Milton Staff Report (PD-070-08). Mixed Use/Residential lands are not being considered in this area to protect for their strategic importance in attracting new employment uses to Milton and Halton Region.
	Milton's proposed Mixed Use Retail/Transit Node is strongly supported as an eminently desirable and strategically positioned focal point for the newly planned residential and employment areas east of James Snow Parkway in Milton and along the north side of Steeles Avenue in Halton Hills. However, we believe it only logical that the whole length of the west boundary of the Mixed Use Area should be the interface with the linear Natural Heritage feature attendant upon Oakville Creek. Ergo, the relatively small and isolated tract on the Trelane property shown as 'Potential Employment' on	The Town of Milton, through staff report PD-076-08, presented Milton's Preferred Land Use Concept for consideration. The Region has reviewed Milton's Concept and consulted with Town of Milton staff in the refinement of the Region's Growth Concepts. The refined Growth Concepts identify proposed employment between Highway 401

Source	SUBMISSION	Response
	Figure 2 should be designated as part of the Mixed Use Node. 2. Re The Natural Heritage Boundary	and the hydro corridor in Milton. Through the employment land analysis completed by Hemson Consulting Inc., employment lands were identified as an appropriate land use along the Highway 401 corridor.
	Where it traverses the Trelane property, the Natural Heritage boundary is a straight line running across the open, cultivated fields which characterize the tableland portion of the farm and well removed from anything which could be considered a Natural Heritage feature or potential buffer related thereto. It differs substantially in extent from the Greenlands 'A' designation shown on the Region of Halton's OPA 25, and appears to derive from the Natural Heritage System boundary shown in the Greenbelt Plan 2005. (See Figure 3.) Section 5.5.2 of the Greenbelt Plan provides for a refinement of its boundaries "at the time of municipal conformity" It is noted that, west of Sixth Line opposite Trelane, the Natural Heritage boundary shown on Figure 2 correctly reflects ROPA 25, i.e. following the west top-of-bank of the Oakville Creek valley which was naturally created by the meandering watercourse before it was diverted and straightened during the mid-1950's to facilitate the building of the Sixth Line overpass of Highway 401, then under construction. (See survey in Figure 4.)	In response to comments received and in consultation with the Sustainable Halton Working Group, the Halton Ecological and Environmental Advisory Committee, and the Halton Agricultural Advisory Committee, the Natural Heritage System has undergone a number of refinements. A report has been prepared that provides an implementation framework for the Natural Heritage System (see Report 3.02: Sustainable Halton Natural Heritage System Definition and Implementation, by North-South Environmental). The NHS will be subject to further refinement through subsequent planning processes.
	In order to illustrate how the east limit of the Natural Heritage System should be refined in accordance with Greenbelt Plan practices elsewhere, Stantec Ltd. Was retained to carry out the necessary field work and policy analysis. Two copies of their report is attached and their findings are shown on Figure 7 therein, a copy of which is inserted in this document as the base for our Figure 5. It is recognized that a precise boundary will need to be defined by studies under municipal auspices with participation by Conservation Halton, when a specific development application is filed pursuant to the Planning Act. In the meantime, it is requested that, when new land use designations relating to the Trelane property are applied pursuant to the Sustainable Halton Planning process, the Natural Heritage Area boundary be drawn so as to reflect Stantec's more realistic expression of the physical conditions which exist and with a more appropriate application of the protective buffer policies as set out in Section 3.2.4 (and especially Sub-section 3.2.4.4) of the Greenbelt Plan 2005. Having reviewed the attached report by Stantec Ltd., we hope	The current limitations of NHS boundary delineation are recognized and as such, direction is provided to aid the final boundary determination that will continue to meet the goal and intent of the NHS as currently mapped. Final determination of the NHS boundary will occur through future sub-watershed studies, secondary plan studies or other site specific studies. The preparation of detailed land use plans will allow final NHS boundary determination to take advantage of additional natural heritage information and analysis that will be available from the associated detailed field studies.
	you will concur that their findings would provide a less misleading indication of the environmental conditions which pertain and a more genuine picture of the Natural Heritage	

Source	SUBMISSION	Response
	System through the Trelane property.	
	Figure 5 shows that the measures recommended above will add some 27.6 ha (68.2 ac) of Trelane tablelands to Milton's proposed Mixed Use Retail/Transit Node. Of that acreage, some 11.1 ha (27.4 ac) will be gained by removing the Natural Heritage designation from tableland which neither exhibits any environmental assets nor is needed as protective buffer for those documented within the Oakville Creek Valley. Some 9.5 ha (23.5 ac), or 25.6 % of the property, will remain within the Natural Heritage designation covering the valleylands of the Oakville Creek plus Conservation Halton's 15 m buffer requirement from the eastern top-of-bank.	
	Gainful use of 11.1 ha of Trelane tablelands for urban purposes would be consistent with Section 1.1.3.2 of the Provincial Policy Statement, 2005 which speaks to: "a) densities and a mix of land uses which: 1. efficiently use land and resources, and 2. are appropriate for, and efficiently use, the infrastructure and public service facilities which are planned or available" Contemporary land use planning policies and practices assign high priority to the creation of compact urban forms while preserving and protecting significant natural heritage features as itemized in Section 2.1 of the PPS, 2005. We submit that these recommended land use modifications contribute positively to both objectives and therefore merit expression in your Sustainable Halton Plan.	
	We thank you for your consideration. Please call if additional information or discussion of this matter might be helpful.	
	Yours truly, Bousfields Inc.	
	Supporting Technical Reports:	
	Preliminary Natural Heritage Evaluation – Stantec (September 2008)	
MTE Consultants for G.V. Properties	Re: G.V. Properties Ltd. Part of West Half of Lot 7, Concession 1, New Survey Trafalgar Town of Milton	
September 30, 2008	We are writing to you regarding G.V. Properties Ltd. & G. A. A. Properties Ltd. who have owned the subject property since 1998. The entire property is currently being farmed for agricultural crops by G.V. Properties Ltd. OFA # 3034758. Mr. Varga is the owner of the company and is also an OFA member #2927630. The subject lands were inventoried by Philips Engineering in the year 2000 through the Sixteen Mile Creek Subwatershed	The landowner should note that the referenced lands are now being considered for potential new employment land, making use of existing rail infrastructure and CN rail activities in the area. Refer to Report 3.08: Working Paper #2, Concepts for Addressing Halton Region's Land Needs to 2031 (Urban Strategies Inc)

Source	SUBMISSION	Response
	Planning Study for Areas 2 and 7, Town of Milton. Further investigations were completed by Philips Engineering in the Functional, Environmental, and Stormwater Management Plan for the Sherwood Survey – Indian Creek/Sixteen Mile Creek Town of Milton Study. The area was identified as being of low constraint.	
	The Subject Property gently slopes from the Northwest to the Southeast with grades averaging between 1-1.5%. There was a localized low point on the property which was identified as a low constraint in the engineering studies.	
	In an effort to maximize the crop yield from the existing farming operations Mr. Varga requested permission from both the Town of Milton and Conservation Halton to fill the low lying area on the property to provide positive drainage. This would eliminate nuisance ponding on the site and provide greater opportunity for crop planting.	
	Mr. Varga completed and submitted a site alteration application with an accompanying grading and siltation erosion control plan to the Town of Milton and Conservation Halton in May of 2006.	
	Upon review of the site alteration application, both the Town of Milton (Mr. Eric Lehtinen) and Conservation Halton (Mr. Cory Harris) waived the requirement for the application as it was determined Mr. Varga was undertaking the grading operation to improve the local drainage on his property as an agricultural function and would no cause any detrimental effect to surrounding drainage patterns or groundwater inputs. Mr. Varga completed the minor filling in fall 2006 with final grading and top soil spreading operations delayed by we weather to spring 2007.	
	Prior to this work being completed, Halton Region Conservation Authority completed updating of regulated areas through use of Topographic Mapping and Air-photo interpretation. The regulated areas were meant to function as a guide and were to be 'ground truthed' at a later date during a level or more detailed studies. We note this preliminary constraint mapping is being utilized by Halton Region in its Sustainable Halton studies.	
	We respectfully submit that as Mr. Varga's requirement for a site alteration application was waived by the Town of Milton and Conservation Halton:	
	 The constraint mapping completed by Halton Region Conservation Authority be updated and amended to remove the low constraint area previously depicted on the property and to eliminate any associated regulation lines from the associated mapping. That this update and amendment be considered as our 	

Source	SUBMISSION	Response
	input into the Sustainable Halton exercise.	
	We enclose recent air-photos of the site and an excerpt for the Subwatershed Study depicting constraint areas for reference.	
	Should you have any questions, feel free to contact this office at your convenience.	
Glen Schnarr and Associates for Orlando Corporation	RE: Sustainable Halton Working Paper #1 - Locating New Urban Land Potential Long-term Employment Land Needs in the Town of Milton	
September 30, 2008	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; 	The Region recognizes the importance of protecting strategic employment lands beyond 2031 and will be providing protection through the Region's statutory five year Official Plan Review process.
	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;	Through the Sustainable Halton Working Group, discussions have taken place regarding the potential designation of additional employment lands to 2031. <i>Report 3.07:</i> Sustainable Halton: Accommodating Growth to 2031, prepared by Hemson Consulting Ltd., indicates support for 1,100 ha of employment land, as a result of an updated land supply analysis. Please also refer to this report for an updated analysis of

Source	SUBMISSION	Response
	 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. 	Through Hemson Consulting Ltd's detailed land supply analysis, market demand for various employment types and densities formed an important component of this analysis. Please refer to the above noted report. Provincial legislation requires conformity. The Region is preparing a plan that best meets its needs and the policies of Places to Grow. The report by Hemson Consulting Ltd. entitled Sustainable Halton: Accommodating Growth to 2031(Report 3.07) provides the details with respect to the Region's land needs.
	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	Recent trends in the development of distribution, warehousing and logistics facilities were considered in the determination of employment lands to 2031. Refer to Sustainable Halton: Accommodating Growth to 2031(Report 3.07) for details on the Region's land needs

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JOURCE	SUBMISSION 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.	RESPONSE
	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:	See previous comments regarding employment density.
	Light industrial distribution and assembly yields approximately 9 to 10 employees/gross hectare; Warehousing and logistics group yields a range of	
	 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	

Source	SUBMISSION	Response
	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 designated that will support the pace of residential growth to be anticipated in Halton Region over the long-term.	As discussed, a range of employment densities were considered in the decision to designate 1,100 hectares of employment lands to 2031. Please refer to the above noted report by Hemson Consulting Ltd.
	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 underestimating 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	Regional staff have considered the comments contained within the submission as part of the Sustainable Halton process. Please refer to Report 3.07: Sustainable Halton: Accommodating Growth to 2031, prepared by Hemson Consulting Ltd.

Source	SUBMISSION	Response
	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 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 22 nd , 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 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 o	The 1,100 hectares identified for future employment include lands adjacent to the Highway 401 and 407 corridors, and lands along Tremaine Road in south Milton, adjacent to the rail line.
Leslie Adams on behalf of P.O.W.E.R. September 30, 2008	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.)	

Source	SUBMISSION	Response
	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.	We do not see the "subtle but substantial" difference between growth and development, in the sense that the latter will not exceed carrying capacity. Halton Region is committed to Sustainability and two key initiatives to address it – Sustainable Halton and the Corporate Sustainability Plan. Staff report LPS32-09/CA-06-09 "An Overview of Sustainability in Halton Region" introduces ten draft Sustainability Principles for discussion and consideration as part of the Regional Official Plan Review. The technical report Connecting Sustainability in Halton RegionFrom Policy to Practise (Report 3.11), discusses various
		sustainability principles, identifies overall sustainability requirements for Halton, and introduces sustainability approaches for Regional Official Plan policies. This takes the Region

Source	SUBMISSION	Response
JUNCE	SUBMISSION	beyond just a growth strategy. [A]
	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.	Through staff report LPS26-08, the Region advised the Province that a six month extension would be required to complete the conformity exercise.
	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.	The Region will release a series of supporting technical reports in April 2009 for public consultation to assist Council's decision on a growth strategy in June 2009. Further consultation on the policy framework for growth will take place during the balance of 2009.
	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.	Policy 1.1.2 of the Provincial Policy Statement states that "sufficient land shall be made availableto meet projected needs for a time horizon of up to 20 years. However, where an alternative time period has been established for specific areas of the Province as a result of a Provincial planning exercise or a Provincial Plan, that time frame may be used". Policy 2.2.1.1 of Places to Grow states that population and employment forecasts contained in Schedule 3 will be used for planning. This requires the Region to plan for growth to 2031.
	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	All of the Technical Reports being prepared for Sustainable Halton (including reports on the natural resources – the Natural Heritage System, and Agricultural Strategy reports), will inform the evaluation process in that they provide a greater level of detail to assist the Region and provide Regional Council with the information they require to make decisions.

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Source	SUBMISSION	Response
	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.	The Natural Heritage System developed by North South Environmental considers our hydrogeological and surface water resources. Please refer to the <i>Natural Heritage System Definition and Implementation</i> report <i>(Report 3.02)</i> by North-South Environmental.
	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.	The Technical Reports are now completed and available for public and stakeholder review and comment.
	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.	Staff is always open to consultation with stakeholders for input to the planning process but at some critical juncture, Council has to make decisions and move forward.
	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.	The Places to Grow Plan requires municipalities to plan for certain population and employment targets. Should the targets fail to materialize, urban development will be at a slower pace and the designated urban areas will last longer than anticipated.
	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	The Region would be pleased to receive any information in this regard.

Source	SUBMISSION	Response
	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 401corridor 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.	The refined Growth Concepts identify employment lands north of Highway 401 in Halton Hills in all Growth Concepts (please see <i>Report 3.08: Working Paper #2: Concepts for Addressing Halton Region's Land Needs to 2031</i>). The Region will include Official Plan policies relating to the phasing of new urban areas to ensure there is always an adequate supply of both employment and residential lands, but the take-up of employment lands is driven by market demand and the economy.
	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.	Provincial policies now prohibit the conversion of employment lands to other uses unless through a comprehensive review.
	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.	Comments noted.
	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,	We agree. The Region has implemented its own approaches to conserving water both in the garden and around the home. The Region would also be pleased to receive any information in this regard.

Source	SUBMISSION	Response
	groundwater may well be the safer and more dependable option.	
	In addressing water security in Halton Hills, a comprehensive analysis of water withdrawls/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.	Comments noted. The Region has implemented programs to encourage residential water conservation. Given the difficulties that the Region has encountered in finding sufficient ground water to service committed developments in Georgetown, a lakebased system is needed to provide for additional growth in Georgetown.
	The subject is extremely important and highly complex. P.O.W.E.R. believes that a system approach is warranted.	It also provides long-term water security for the community.
	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 reviewing 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.	North South Environmental has developed a report entitled Sustainable Halton Natural Heritage System: Definition and Implementation (Report 3.02). The Region is proceeding with a systems based approach.
	11) Agricultural Lands	

Source	Submission	Response
	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.	Planscape has prepared a report, Agricultural Countryside Strategy (Report 3.04), which discusses how agricultural sustainability can be achieved. It is understood that land use policies alone cannot do this and that applying other tools with policies can be more effective.
	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.	Through this response document, the Region has made available to the public and stakeholders the positions of all those who have in writing, shown an interest in Sustainable Halton.
KLM Planning Partners Inc. for Ron Baldassarra September 30, 2008	Re: Sustainable Halton September PIC Workbook Comments Part of Lots 13 and 14, Concession 2 Mr. Ron Baldassarra Town of Milton KLM Planning Partners Inc. are the Planning Consultants for Mr. Rob Baldassarra owner of an approximate 36 hectare (89 acre) parcel of land located on the south side of Lower Baseline, 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 of 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.	Through regular meetings of the Sustainable Halton Working Group (comprised of Regional and Local Municipal planning staff, and Public Agency staff), discussions have taken place regarding the potential designation of additional employment lands to 2031. The report titled Sustainable Halton: Accommodating Growth to 2031 (Report 3.07), prepared by Hemson Consulting Ltd., indicates support for approximately 1,100 ha employment land.
		The Region is fortunate to have many areas that are well positioned for new employment uses (See Figure 4.2 of <i>Working Paper #2: Concepts s for</i>

Source	SUBMISSION	Response
		Addressing Halton's Land Needs to 2031, prepared by Urban Strategies Inc. (Report 3.08) The 401 Corridor (including lands along the future James Snow Parkway), the Highway 407 corridor in east Milton, and lands in south Milton adjacent to the rail line, have been identified by the Region and the Local Municipalities as priority areas for new employment lands to meet the Region's needs to 2031. However, the Region also recognizes the importance of future strategic employment land post 2031 and will be identifying these areas through policy direction as part of the statutory five year Official Plan Review process.
	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, and take into account the needs of existing and future businesses 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,	

Source	SUBMISSION	Response
Source	Submission 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 location 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 6 th 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 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 pu	See above response.
Glen Schnarr and Associates for Shipp Corporation	RE: Sustainable Halton Working Paper #1 - Locating New Urban Land Shipp Corporation - New Employment Land Needs in the	

Source	SUBMISSION	Response
September 30, 2008	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.	Hemson Consulting Ltd has completed an updated land supply analysis which incorporated additional information, including 2006 Census data. Further analysis of the type of employment occurring in Halton also took place. As a result, the employment land needs has been increased to a total of 1,100 hectares. The detailed land supply analysis can be found in <i>Report 3.07: Sustainable Halton: Accommodating Growth to 2031</i> by Hemson Consulting Inc. Included as part of this 1,100 hectares is a proposed 200 hectares of employment land along Tremaine Road in south Milton, adjacent to the rail line.
	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. As supported by Town of Milton Council at its meeting on September 22 nd , the Tremaine Road Corridor south of	The Region is fortunate to have many areas that are well positioned for new employment uses (See Report 3.08: Concepts for Addressing Halton's Land Needs to 2031, prepared by Urban Strategies Inc.) The 401 Corridor (including lands along the future James Snow Parkway and the west side of the 407 at the 401) and the CN Rail corridor in Milton have been identified by the Region, the local municipalities and the their consultants as priority areas for new employment lands to meet the Region's needs to 2031. The Region recognizes the economic opportunities that the CN Rail

Source	SUBMISSION	Response
	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.	corridor provides. The Region also recognizes the importance of protecting strategic employment lands beyond 2031 and will be providing protection through the Region's statutory five year Official Plan Review process.
	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.	See above response
	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.	
Smart	RE: Sustainable Halton ~ Five Growth Concepts	
Centres for Georgetown Shopping Centres Limited	Dear Sir or Madam: SmartCentres is the agent for Georgetown Shopping Centres Limited ("GSCL"). GSCL purchased a 20-hectare parcel of land at the southeast corner of the intersection of 10 th Side	
September 30, 2008	Road and 9 th Line. The parcel is directly south of the Georgetown urban area boundary (the "GSCL Site") and was purchased with the intention of developing a conveniently	

Source	SUBMISSION	Response
	located retail/service commercial facility.	
	The purpose of this letter is to inform Halton Region of GSCL's development interests, and provide comments on the growth options identified in Phase II of Sustainable Halton. SmartCentres has been following and participating in the Sustainable Halton process. Most recently, representatives attended the Region's Public Information Meeting of September 16, and spoke at the Town of Halton Hills Special Council Meeting on September 24th, 2008. While there are several residential developers with interests in Halton Hills and Georgetown, GSCL is the only commercial developer with interests in the area. As such, GSCL represents an otherwise unrepresented stakeholder interest in the Sustainable Halton process. Based on the goals and objectives identified in the Sustainable Halton Evaluation Framework, the GSCL Site is within an area	Regional staff have considered the comments contained within the
	that should be identified for future urban growth. SmartCentres' analysis indicates that the existing population (residents of Georgetown and the Town of Halton Hills) is underserved in terms of the retail and service commercial space. It is therefore SmartCentres' opinion that the GSCL Site should be brought into the Urban Area to provide additional retail and service uses to existing Georgetown and The Town of Halton Hills residents, regardless of the growth concept recommended.	submission as part of the Sustainable Halton process. The lands referenced in the submission are being considered as potential areas for new mixed-use/residential development, which includes retail and service uses. The evaluation process, using the evaluation framework, will be used to evaluate the relative merits of proposed locations for new urban lands. Please refer to Working Paper #2: Concepts for Addressing Halton's Land Needs to 2031 (Report 3.08), prepared by Urban Strategies Inc. for additional details on the potential locations for new urban lands.
	SUSTAINABLE HALTON AND THE REFINED GROWTH CONCEPTS	
	Expanding the urban boundary to include the GSCL Site will provide a conveniently located retail destination that is logically and functionally compatible with the existing development pattern of Georgetown.	
	Retail Services in Georgetown Georgetown residents are currently underserved in terms of the amount and selection of retail and service commercial shops. In particular, Georgetown is lacking the range of shopping opportunities that are present in centres such as Milton and Brampton. Georgetown is also lacking vacant designated sites where such facilities could be accommodated to better serve the community	
	The undersupply of retail facilities in Georgetown has resulted in an outflow of residents' expenditures. Georgetown	

Source	SUBMISSION	Response
	residents are traveling to shopping facilities outside of their community to meet their shopping needs. The outflow of expenditures will continue to increase as the remaining residential lands within the Georgetown 2021 Urban Area boundary are developed. Therefore, a significant amount of additional retail and service space could be supported in Georgetown based on the 2021 Urban Area Boundary, even in the absence of additional population growth being allocated to Georgetown through the Sustainable Halton process.	
	GSCL acquired lands at this particular location recognizing the benefit that new retail and service commercial space would bring to the residents of the Town.	
	Planning for Retail Lands Retail and service commercial uses are a key element of complete, healthy and sustainable communities, as well as a fundamental economic activity, accounting for a significant number of jobs. In 2007, shopping centres were the source of 1,563,000 jobs while accounting for 2/3 of all retail sales, being \$270 billion or roughly 18% of Canada's GDP. In addition to creating jobs and contributing to complete communities, proper planning for retail uses will recapture lost expenditures. However, planning for retail, and in particular	The Region agrees that retail is an important part of the community and should be properly planned for. The detailed planning will occur through local municipal and secondary planning of any new urban areas in Halton Hills.
	large retail facilities, is often inadequate as policies affecting land for retail uses are frequently inconsistent or unclear. The Ministry of Public Infrastructure Renewal paper <i>Planning</i>	One of the key directions of the
	for Employment in the Greater Golden Horseshoe, May 2008 has expressed similar concern that retail uses are not being adequately planned. The Province is encouraging municipalities to proactively plan for employment areas including retail employment uses.	Province's Place to Grow Plan is to plan for employment areas separately from retail uses, since retail development should now be planned to be part of a complete residential community.
	In terms of the Sustainable Halton process, there is a concern that insufficient land is being identified for retail uses, especially large retail uses. In the Sustainable Halton Phase 1 report Land Supply Analysis, May 2007, Hemson Consulting Limited assumed that land requirements for "Other Lands", which includes retail uses, will be 20% of the land required to accommodate residential growth. While this assumption is informed by Hemson Consulting's past experience, it is not to SmartCentres' knowledge based upon an analysis of local municipal conditions and the actual community infrastructure and population serving employment/retail uses that are necessary to accommodate growth.	The Region's local municipalities will determine the amount of retail, service and commercial uses to be provided on new mixed-use/residential land needed to meet the needs of the current and planned population, at the later stages of the planning process. Please refer to Working Paper #2: Concepts for Addressing Halton's Land Needs to 2031 (Report 3.08), prepared by Urban Strategies Inc., for additional details on the potential locations, density and land use patterns for new urban lands.
		With respect to the 20% requirement

Source	SUBMISSION	Response
		for "Other Lands", Hemson Consulting Ltd. notes that in their experience, this is typically sufficient land for these uses. In addition, local retail is separately accounted for within the neighbourhood level gross land areas.
	Including "Other Lands" within the quantum of land being identified for Mixed Use/Residential lands in the growth concepts provides local municipalities the flexibility to plan for retail uses in response to local municipal conditions. However, if insufficient Mixed Use/Residential land is identified through the Sustainable Halton process, then the Town of Halton Hills will have difficulty creating local plans that accommodate both the forecasted population growth and the community infrastructure and population serving employment uses that accompany that residential growth.	Places to Grow states that urban growth centres, major transit station areas and intensification corridors should be planned to include commercial uses
	With that in mind, retail and service commercial land uses, especially those serving the broader community, should not be forgotten. At this time, SmartCentres has not assessed the validity of the total quantity of 3,000 hectares of land that were identified to accommodate forecasted growth. Instead, attention is focused on the need for proactively planning for retail uses and identifying land for future retail growth which has a realistic prospect of being effectively developed to accommodate the necessary retail uses.	Hemson Consulting Ltd has completed an update to the land supply analysis. Please refer to <i>Report 3.07: Sustainable Halton: Accommodating Growth to 2031</i> , for further information.
	Moving from a Refined Growth Concept to the Preferred Growth Option Having reviewed the Sustainable Halton materials and participated in the public process, it is apparent that the GSCL Site should be identified for future urban development.	
	Phase II of Sustainable Halton and the Evaluation Framework support the position that the GSCL Site is appropriate for future urban growth. Furthermore, the GSCL Site is contained within the areas identified for future urban development in refined concepts 2A and 3B. The GSCL Site is located within the Designated Greenfield Area on Schedule 2 of the Growth Plan and is outside the Greenbelt Plan Area.	
	The GSCL Site abuts the Georgetown Urban boundary, and as such, is proximate to existing urban infrastructure. It is well served by existing roads and is in close proximity to the interand intra-regional transportation infrastructure. The proximity to transportation infrastructure will minimize the travel distance of existing and future residences. In addition, Schedule B1 of the Town of Halton Hills Official Plan identifies both 10th Side Road and 9th Line as "Major Arterials", and as such, development of the GSCL Site would be supportive of efforts to bring public transit to the area.	

Source	SUBMISSION	Response
	SmartCentres maintains that regardless of which growth concept is approved, the GSCL Site should be included in the Georgetown Urban Area boundary in order to address the current retail market deficiency. SmartCentres' position is that the current market is underserved in terms of quality and quantity of retail and service commercial business. Population growth coupled with a lack of undeveloped designated lands within the current urban boundary will only exacerbate this situation. Additionally, there is a need to better plan for retail and service commercial space. By planning for retail and service commercial uses proactively, complete communities can be built while maximizing efficiency of land use and infrastructure. The GSCL Site for retail and service commercial use is consistent with the objectives and criteria set out in the Sustainable Halton Evaluation Framework. Thank you for the opportunity to present GSCL's perspective. SmartCentres looks forward to working with the Region of Halton during the development of the GSCL Site.	
Townsend, Rogers LLP for Southwest Georgetown Landowners Group September 30, 2008	Re: Sustainable Halton Plan Working Paper #1, Locating New Urban Land Our firm represents a group of landowners in Halton Hills, formally known as the South West Georgetown Landowners Group. Our clients' lands are comprised of 1,000 acres situated south west of the current Georgetown urban boundary and are bounded by: 15 th Sideroad to the North, 8 th Line (Main St.) to the East, 10 th Sideroad to the South and Trafalgar Road to the West. An aerial photograph depicting the lands is attached. The landowners' group, consisting of Mattamy Homes, Remington Homes, Country Homes, Lormel Homes and Conservatory Group own approximately 90% of the 1,000 acres in question. It has been actively involved in the Sustainable Halton Plan process and its predecessor updates to the Halton Plan for many years. Our clients have contributed numerous submissions to both the Town of Halton Hills and Halton Region by way of reporting, correspondence and presentation material informing the municipalities of its position throughout the process. It is the position of the professionals engaged by the landowner group that the South West Georgetown lands would make the most efficient and logical area for urban expansion in Halton Hills. Notably Halton Hills Council has recently endorsed a report recommending an expansion to the Town population of	The referenced properties are being considered as a potential location for new urban lands in one or more of the refined Growth Concepts. The evaluation process, employing the evaluation framework, will be used to evaluate the relative merits of proposed locations for new urban lands, taking into account the issues

Source	SUBMISSION	Response
	only accommodate these numbers efficiently, they also provide the opportunity for many of the capital improvements required by Halton Hills in a feasible and fiscally responsible manner.	
	Expanding the Georgetown Urban Area to include the South West lands will allow Halton Hills the opportunity to round out its urban boundary while completing a community centred around the Trafalgar Road/Main Street spines. As noted by the local BIA and Chamber of Commerce the integration of the lands west of Main Street into the urban area will enhance the existing economic opportunities in the downtown. The existing urban boundaries of Georgetown and the boundaries of the natural heritage features and linkages add to the logic for expansion in this location. Using these boundaries growth can be contained and the lifestyle of the small community of Georgetown maintained. Servicing the lands can be accomplished both regionally and local within affordable parameters while ensuring it will not result in further future expansions. It should be noted that this site also avoids contentious aggregate deposits that are currently being considered by the Province and Region as part of Sustainable Halton Plan. In additions to the existing and potential employment lands along the 401 series Highway the South West lands concept provide population based employment within the community reducing commute time and allowing for and enhanced live/work relationship.	The refined Growth Concepts will be based on a range of population for Halton Hills (no additional population growth, 20,000 additional people). Upon developing the preferred growth option, specific locations for where growth will occur will be determined in close consultation with the Town of Halton Hills staff.
	In terms of servicing, the South West Georgetown Landowners are in support of servicing this site via groundwater, should the Region find that such servicing is available. Our clients are aware of the current studies being conducted by the Region and have continuously offered assistance to Region staff in its efforts to accommodate and expansion to Georgetown, servicing may also be available via and extension to the Region of Peel system and this option will be fully explored by SWGLOG engineers with the Regions of Peel and Halton as part of the servicing options available for these lands. AS a final alternative, our clients are satisfied, based on the profession opinions of our engineers and other relevant consultants, that any lake-based system requirement to service up to 20,000 population is attainable and affordable. In addition, our group will consider various financing arrangements with the Town and the Region in regard to other capital projects (i.e. Library expansions, recreation centre development, etc.) with a view to early delivery of community infrastructure.	The purpose of staff report PPW 30-08 was to make Council aware that the Commissioner of Public Works and Engineering Services would initiate discussions with the Region of Peel to explore the potential for servicing growth areas from the Region of Peel's water and wastewater systems. These options would be included for consideration through the Sustainable Halton process. A high level financial analysis of the impact of transportation and water and wastewater infrastructure associated with the refined Growth Concepts will be conducted and will demonstrate at a high level, the costs of the Growth Concepts to assist in decision making towards the selection of a preferred land use option.
	Our client remain concerned with the proposed Enhanced Natural Heritage System ("ENHS") as illustrated on the Growth	In response to comments received and in consultation with the

Source	SUBMISSION	Response
	Option Schedules and believe it overstates some of the features and that there are come inaccuracies in the mapping. More specifically, the south west corner of our clients' lands has been identified and included as part of the ENHS, where we believe it to be of less significance, requiring further consideration. Our clients would like the opportunity to work together with the Region and Town to come to terms with issues such as these.	Sustainable Halton Working Group (comprised of Regional staff, Local Municipal Planning staff, and Public Agency staff), the Halton Ecological and Environmental Advisory Committee, and the Halton Agricultural Advisory Committee, the Natural Heritage System has undergone a number of refinements. A report has been prepared that provides an implementation framework for the Natural Heritage System (see report, Natural Heritage System: Definition and Implementation (Report 3.02), by North-South Environmental).
		The current limitations of NHS boundary delineation are recognized and as such, direction is provided to aid final NHS boundary determination that will continue to meet the goal and intent of the NHS as currently mapped. Final determination of the NHS boundary will occur through future sub-watershed studies, secondary plan studies or other site specific studies. The preparation of detailed land use plans will allow final NHS boundary determination to take advantage of additional natural heritage information and analysis that will be available from the associated detailed field studies.
		The Region has met with the Southwest Georgetown Landowners Group to discuss the details of their submission.
	The South West Georgetown Landowners Group remains to the belief that these 1,000 acres are the most reasonable, logical, and feasible site from which to expand the Georgetown Urban Area. As mentioned, they remain committed to working with the Region in order to develop this site as a sound reflection of a complete community in the Sustainable Halton Plan and welcome any opportunity to work through further details with you.	
	Supporting Technical Reports: 1. Natural Heritage System Inventory Opportunities and Constraints – LGL Ltd. (November 19, 2008) 2. Agricultural Assessment Report – AgPlan Ltd.	With respect to agriculture, the Agricultural Assessment Report submission was made as part of the ROPA25 hearing and thus was

Source	SUBMISSION	Response
	(February 2006)	available to the Region as the agricultural assessments in support of Sustainable Halton were being conducted. The submission was considered as part of the Halton Land Evaluation and Area Review (LEAR) Study and in formulating the recommendations arising from it. Please refer to the findings of the LEAR study in the report, <i>An Agricultural Evaluation (Report 3.03)</i> and the subsequent recommendations of the report, <i>Agricultural Countryside Strategy (Report 3.04)</i> .
Total Developments International September 30, 2008	RE: Comments Sustainable Halton – Five Concepts As a group who has worked in the development industry for the past 25 years in Halton we have a number of comments / concerns with respect to the five current proposals. As our activity as a developer has been generally in Milton and Halton Hills we are familiar with both municipalities and some of the challenges the Region and the Municipalities face with respect to growth. In an effort to organize our comments we have broken them down into 6 categories. The first category is general to all of the concepts, while the other comments have been arranged by concept. General	
	 Employment Lands One of our major concerns is that the area for Employment Lands shown in all concepts is in our opinion is too little. We make this comment for the following reasons: In starting the planning exercise did the Region of Halton give consideration to each municipality's current position with respect to current assessment levels and the goals of each of the municipalities with respect to the ratios of ICI versus residential assessment? If there is already a shortfall in a specific municipality's goal in this area this should first be considered and then the ratio maintained throughout the planning horizon. In the case of Milton we understand their desired ratio has been slipping and in the case of Halton Hills the current ratios are out of balance. Without such an assessment high property tax increases such as those experienced in Halton Hills in 2008 and forecast for the next few years will become the norm. Furthermore this does not help in building "Complete Communities". 	Hemson Consulting Ltd has completed an updated land supply analysis. Based on additional information (which included previously unavailable 2006 Census data), as well as further analysis of the type of employment development occurring in Halton, the employment land needs has been increased to a total of 1,100 hectares. The detailed land supply analysis can be found in <i>Report 3.07: Sustainable Halton: Accommodating Growth to 2031</i> by Hemson Consulting Inc. Achieving an activity rate (the ratio of jobs to residents) for each of the Local Municipalities that reflects balanced, sustainable communities was a key consideration when refining the Growth Concepts. Local Municipalities were active participants in this exercise.

Source	SUBMISSION	Response
	As we are of the opinion that more employment lands are required the Highway 401 and Trafalgar Road interchange should be reviewed as a possible location for these lands in terms of not only its' key location within the western GTA but also compatibility with existing uses such as the CP Freight Terminal. The currently proposed employment lands could be expanded both north and south of Highway 401.	Based on the updated employment lands needs, priority areas for employment were identified in consultation with the Local Municipalities (See Figure 4.2 of Report 3.08: Working Paper #2: Concepts and Options for Addressing Halton Region's Land Needs to 2031, by Urban Strategies Inc.). The Region will also be protecting strategic employment lands beyond 2031 through the Region's statutory five year Official Plan Review process.
	■ Did the Region of Halton analyze the mix of employment types that would likely locate in the Region and each specific municipality within the planning horizon? These employment types retail, versus office, versus manufacturing versus warehousing cannot be dictated through a planning process or political will, but realized through market demand. In this hierarchy retail follows residential while office will only gain momentum after manufacturing and warehousing. In our opinion in north Halton this may occur late within the planning horizon or even beyond the planning horizon of 2031. As for manufacturing which we hear a lot about, this sector is experiencing a rapid decline in Ontario. With Highway 401 crossing North Halton warehousing and logistic uses are likely to continue to be attracted to the employment lands adjacent to Highway 401 throughout the planning	Through Hemson Consulting Ltd's detailed land supply analysis, market demand for various employment types formed an important component of this analysis. Please refer to <i>Report 3.07: Sustainable Halton: Accommodating Growth to 2031.</i>
	horizon. During the 2007 / 2008 development charge process the Region were provided through different groups a considerable amount of information relating to current market conditions and the densities for the different employment types. For example if warehousing / logistics is the prominent employment type expected in North Halton then with low employee densities per acre a larger land mass must be created in order to accommodate the foreseeable demand and maintain the desired ICI / residential assessment ratios. While these densities have yet to be considered in determining the denominator for development charges it is imperative that consideration is given to these vital statistics during this very important planning exercise if the Region is going to provide adequate employment lands to meet the employment projections contained in their Best Planning Estimates.	Various employment densities and types were considered as part of the analysis to determine the employment land needs for the Region to 2031.

Source	SUBMISSION	Response
	Consideration should be given to the CN Lands in behind the Halton Waste Management Site.	Approximately 200 hectares of land in south Milton along Tremaine Road, adjacent to the rail line are included in the 1,100 hectares of employment land needs. The Growth Concept maps can be found in the report Working Paper #2: Concepts for Addressing Halton's Land Needs to 2031 (Report 3.08), prepared by Urban Strategies Inc.
	Infrastructure, Services and Cost	
	 Another major concern is: Can the Region of Halton afford the concepts being put forth? Cost is not only the initial construction but the long term operation and maintenance of infrastructure and of course the various other services required in a growing community. It is our understanding that only very high level cost estimates have been done at this point of time. With Halton already plagued by the highest development charges in the GTA it is extremely important if Halton is going to compete for economic development with other surrounding communities that economic viability of any concept be highly scrutinized. The current Master Plans should be revised to ensure the maximum utility value of the infrastructure to be constructed. Servicing routes should be chosen in a manner that development occurs along the length of the servicing corridors. This is not the case in any of the concepts when one looks at the southerly section of Trafalgar Road from north of Highway 407 to north of Britannia. 	The Region is undertaking a financial assessment which will result in a high level analysis of the transportation and water and wastewater costs associated with the Growth Concepts. A detailed fiscal impact analysis will be undertaken for the preferred growth option. Economics is one of the factors being considered in the evaluation of growth option through the fiscal impact analysis. Master Plans will be updated after a preferred land use option is selected by Council. Maximum use of existing infrastructure is always considered through the Master Plans. It is important to note that there are no local connections to transmission mains such as the Alternate Feed to Milton along Trafalgar Road between Highway 407 and Britannia Road.
	Transportation Since development began in the early 2000s the traffic situation in Milton has rapidly deteriorated. AM east bound traffic already backs up on Highway 401 to at least James Snow Parkway and many commuters in communities to the west (ie: Cambridge etc) seek alternative routes through Milton. This combined with the considerable population increases in Milton as supported by all the concepts will only cause the situation to continue to deteriorate. Currently with the Milton Go Train Station and parking already at capacity there are not many alternatives for new residents of Milton. If a Go Train Station with adequate parking was strategically	Though the Region has no ultimate jurisdiction over the location of GO Transit Stations, it has expressed support for a GO Transit Station located in Milton at Highway 401 and Trafalgar Road, which would support a proposed node of mixeduse/residential and employment uses.

Source	SUBMISSION	Response
	located near the future Highway 401 and Tremaine Road interchange this would provide the following: Potential relief for Highway 401 congestion by providing a rapid transit alternative Potential reduction in commuter travel through Milton by providing a rapid transit alternative on the westerly limit Reduce the need for Milton's growing population of having to travel through Milton to either the existing Go Train Station with limited or no parking or the proposed Go Train Station at Trafalgar Road. Concept 1 – Milton Centered	
	 Some residential should occur in Halton Hills Will Milton maintain its' identity with a large mixed use residential development from Trafalgar Road east to the 407 corridor. Mixed use residential should not reach as far north as the CP Railway line as residential uses should not be in such close proximity of the CP Freight Terminal. Why is the existing "man made" golf course on the east side of Trafalgar Road part of the natural heritage system? How was this determined? 	The boundaries of the Natural Heritage System have been refined based on comments received. The report, Sustainable Halton Natural Heritage System: Definition and Implementation (Report 3.02) prepared by North-South Environmental Inc. describes the process used to define and delineate the Natural Heritage System. The location of the centre for biodiversity in the vicinity of Trafalgar Road, south of Britannia Road has been revised in response to comments received. The current limitations of NHS boundary delineation are recognized and as such, direction is provided to aid final NHS boundary determination that will continue to meet the goal and intent of the NHS as currently mapped. Final determination of the NHS boundary will occur through future sub- watershed studies, secondary plan studies or other site specific studies
	Concept 2a – Milton and South Georgetown	studies or other site specific studies.

Source	SUBMISSION	Response
	Prior to South Georgetown being expanded to the south the area to the west of the existing South Georgetown should be expanded as this will square off the existing Community with developments that have occurred to the north having the impact of bringing South Georgetown closer to the Old Georgetown.	Comments noted.
	Concept 2b - Milton and Southwest Georgetown	
	 We concur with the Town of Halton Hills position with respect to the amount of limited growth that should take place and are of the opinion this concept can work with their position with a minor modification that would only see development only on the east side of Trafalgar Road. While there has been mention of a possible Peel 	Comments noted.
	Servicing alternative to support the 20,000 growth with development limited to the southwest corner this will retain a buffer between Peel and Georgetown. Furthermore, other servicing alternatives for limited growth should be reviewed as there may be a more economical alternative from the south and west. Limited growth in Georgetown South should also benefit the rest of the Region as this should result in reduced servicing costs when compared with large scale growth in Georgetown South.	
	Concept 3a - Milton and ROPA 25 Settlement Area	
	 Disagree with large scale growth in Georgetown as the Region as a whole cannot afford it as the servicing costs up Trafalgar Road from Highway 407 will be 100% attributed to Georgetown. 	Comments noted.
	<u>Concept 3b - Milton and South / Southwest</u> <u>Georgetown</u>	
	■ Disagree with large scale growth in Georgetown as the Region as a whole cannot afford it as the servicing costs up Trafalgar Road from Highway 407 will be 100% attributed to Georgetown.	Comments noted.
MHBC Planning for Trafalgar Golf and Country	RE: Trafalgar Golf and Country Club Submission for Consideration in the Region of Halton's Sustainable Halton MHBC File #07130A	

Source	SUBMISSION	Response
Club September 30, 2008	We act on behalf of Trafalgar Golf and Country Club (TGCC), which has operated a private 18-hole golf course on its property in Milton for 50 years.	
	TGCC is a significant landowner in the BPII Secondary Plan area identified in the Town of Milton's Official Plan, as it owns a property approximately 63ha in size located at the southwest corner of a major arterial road (Derry Road) and a collector road (6th Line).	
	While TGCC intends to continue to use the land as a gold course and country club into the foreseeable future, it continues to strategically look ahead at viable future development prospects, as market demands shift westerly from Mississauga and as overall servicing and road infrastructure needs are developed to the site.	
	In July 2007, Trafalgar Golf and Country Club retained a project team of consultants from various disciplines (natural environment, economic/market, servicing and drainage, planning and legal), to provide advice and recommendations on: (i) future growth opportunities that enhance future land value; (ii) how these growth opportunities can be protected for and promoted through the Town's current strategic initiative (i.e. the Derry Green Business Park Secondary Plan Review).	
	Since July 2007, considerable preliminary research has been completed and the result of that research has been combined in the following enclosed reports:	
	 "Planning Overview" prepared by MHBC Planning, January 2008 "Preliminary Environmental Overview" prepared by Golder Associates, January 2008 (Appendix A to Planning Overview) "Preliminary Servicing and Drainage Overview" prepared by C.F. Crozier & Associates, January 2008 (Appendix B to Planning Overview) "Economic and Market Opinion" prepared by Altus Clayton, December 2007 (Appendix C to Planning Overview) 	
	General and specific recommendations are made by the consulting team within these reports to optimize future land use option for the TGCC lands.	
	These reports have been provided to the Town of Milton as input into the Town's Derry Green Business Park Secondary Plan process. However, in reviewing the Sustainable Halton exercise and attending the Region's Public Information Centre on September 16 th , it has become apparent that similar input should be provided to the Region on behalf of TGCC with specific comments relating to the Sustainable Halton exercise.	

Source	SUBMISSION	Response
	Key Comments on the Region's Sustainable Halton Exercise	
	The following comments are being submitted on behalf of TGCC on the Region's Sustainable Halton exercise and the Five Growth Concept alternatives in relation to its property in the Town of Milton	
	 For the reasons summarized below, Concepts 3A and 3B are preferred. 	
	 As recommended by Altus Clayton in their 'Economic and Market Opinion' report (enclosed), flexibility of permitted uses UNDER THE 'EMPLOYMENT' DESIGNATION is IMPORTANT given the competitive disadvantage of lands removed from 400-series highways, including the southern portion of Milton's Derry Green Business Park Secondary Plan Area (particularly lands south of Derry Road). The Region of Halton appears to recognize there is a clear preference for new employment lands along 	Consideration of the range and flexibility of employment uses should be addressed through the Town of Milton Derry Green Corporate Business Park Secondary Plan process. The Region has invested heavily in the 4 lane widening of James Snow Parkway, which is now the western boundary of the business park. This road provides a direct arterial road
	400-series highways, particularly Highway 401, as this is recognized in all 5 Growth Concept alternatives.	connection to Highway 401 and is intended in part for industrial traffic use, to keep trucks out of residential areas. We also note many successful industrial parks in Brampton, Mississauga and Caledon are further away from Highway 401 and have built out well.
	 Concepts 3A and 3B appear to recognize the competitive disadvantage of restricting land use permissions to employment-type uses on lands too far removed from these major transportation corridors. These two Concepts enhance future marketability of lands in the southern portion of Milton's Derry Green Secondary Plan, including the TGCC lands, by identifying the subject lands for mixed use/residential uses. In addition, Altus Clayton's 'Economic and Market Opinion' report indicates that from a market and timing of development perspective, a residential designation for the TGCC lands would be the preferable option over employment. Accordingly, Concepts 3A and 	With respect to the redesignation of the southern portion of Milton's Derry Green Business Park, as illustrated in Concepts 3A and 3B, through Town of Milton staff report PD-076-08, dated September 22, 2008, Milton Council resolved to keep these lands as employment as designated in the current official plan. Thus, a redesignation from employment to residential is not contemplated and has not been considered in the refinement of the Growth Concepts.
	3B ultimately represent the greatest flexibility for permitted uses in the future due to the potential Mixed Use/Residential category.	It is the Region's position that the market for single storey industrial buildings will continue in Milton, due to its Highway 401 access and being the next westerly large industrial area on Highway 401 as sites in Mississauga and Brampton become

Source	SUBMISSION	Response
	Further, with the extension of services in the Derry Green Business Park originating from Highway 401 and James Snow Parkway (as currently proposed by the Town of Milton), the lands in the southern portion of the Business Park, including the TGCC lands, are expected to among the last to be serviced.	full. While the subject lands do not have Highway 401 frontage, access is indeed very good due to access to Highway 401 via Trafalgar Road or James Snow Parkway, and Highway 407 via Derry and Britannia Roads. Many very successful employment areas in the GTA have similar access characteristics. See below response to technical report "Preliminary Servicing and Drainage Overview"
	The Altus Clayton report also makes the point that from a market perspective the lands south of Derry Road would be at a competitive timing disadvantage for employment uses. The servicing delay (noted above) further hinders the timing of development of business park opportunities.	
	To help resolve this issue, a request has been made, on behalf of TGCC, that the Town allow more flexibility in the uses permitted on lands south of Derry Road and alternative means of servicing the lands south of Derry Road. Both of these measures would provide an opportunity for appropriate development of the subject lands should there be a need for uses contemplated by the Mixed Use/Residential designation at an earlier stage than currently contemplated.	See previous response
	 Finally, the area identified as 'Enhanced Natural Heritage System' should be refined as it relates to the TGCC lands in order to reflect the findings of a more detailed 'Preliminary Environmental Overview' prepared by Golder for TGCC landholdings (enclosed). 	The Natural Heritage System has undergone a number of refinements based on comments received (please refer to report, <i>Sustainable Halton Natural Heritage System Definition and Implementation</i> , by North-South Environmental). The current
	We intend to continue to monitor the Sustainable Halton exercise and ask that we be placed on your circulation list for future notice of any upcoming public or landholder meetings or any other opportunity available to the public to provide further comment on related reports, etc.	limitations of NHS boundary delineation are recognized and as such, direction is provided to aid final NHS boundary determination that will continue to meet the goal and intent of the NHS as currently mapped. Final determination of the NHS boundary will occur through future sub-watershed studies, secondary plan studies or other site specific studies.
	Supporting technical reports:	Response to Technical Report -

Source	SUBMISSION	Response
	1) Planning Overview – MHBC Planning (January 21, 2008) 2) Preliminary Environment Review – Golder Associates (January 17, 2008) 3) Preliminary Service and Drainage Overview – CF Crozier & Associates (January 17, 2008) 4) Economic and Market Opinion – Altus Clayton (December 20, 2007)	Preliminary Service and Drainage Overview: This report appropriately reflects the 2008 South Halton Master Plan Update. In addition, it is important to note that future servicing of the Trafalgar Golf & Country Club will be dependent on finalization of the 2008 Allocation Program and Regional Council approval of a financial plan for funding construction of the required water and wastewater infrastructure.
Glen Schnarr & Associates for Trinison Mgmt Corp September 30, 2008	RE: Sustainable Halton Working Paper #1 - Locating New Urban Land Milton Employment Land Redesignation to Mixed Use/Residential We are the Planning Consultant to Trinison Management Corporation who owns approximately 225 acres in the Town of Milton bounded by Derry Road to the north, James Snow Parkway to the west, Sixth Line to the east and a tributary to the Sixteen Mile Creek to the south (see attached location map). The subject lands (minus the potential environmental constraints) affected by the Region's consideration for redesignation from Employment to Mixed-Use/Residential encompass approximately 175 ha (435 acres). Over the past several years, our client has aggressively marketed and profiled their employment lands to attract industries and users with no success. Through feedback on their marketing campaign, it has come to their attention that these lands are not attractive to future users. The following is a list of some of the reasons why this is so: Lack of visibility to the Highway 401 corridor; Lack of access to the rail corridor; Inferior location adjacent to an existing residential community; Adjacent to existing and proposed residential lands and potential for land use incompatibility; and, Fragmented employment land due to substantive environmental constraints. We have been actively participating in the Region's Sustainable Halton Plan process with respect to the Region's consideration for re-designating the employment lands south of Derry Road in the Milton Derry Green Secondary Plan area into Mixed Use/Residential uses. The purpose of our submission is to provide support for the re-designation and	With respect to the redesignation of the southern portion of Milton's Derry Green Business Park, through Town of Milton staff report PD-076-08, dated September 22, 2008, Milton Council resolved to keep these lands as employment as designated in the current official plan. Thus, a redesignation from employment to residential is not contemplated and has not been considered in the refinement of the Growth Concepts.

Source	Submission	Response
Source	Provide our comments on the Sustainable Halton Working Paper #1 – Locating New Urban Land. Two of the five Growth Concepts (Options 3a and 3b) from the Region's Working Paper #1 indicate the potential for designating these lands into Mixed-use/Residential. We strongly support the Region's consideration for the redesignation and we feel that there is strong planning rationale and justification as follows: 1. The Town of Milton and the Region of Halton have an economic objective to ensure that long-term viable employment lands are protected and to provide the most competitive locations possible. The Region's Comprehensive Economic Development Strategy states that the goal of Sustainable Halton for major employment land areas is to provide sufficient, well-located employment land designations to accommodate the needs of Halton to 2031. As discussed earlier, the subject lands cannot be considered viable and competitive for the following reasons: • They lack visibility to the Highway 401 corridor; • They lack access to the rail corridor;	The Region has invested heavily in the 4 lane widening of James Snow Parkway, which is now the western boundary of the business park. This road provides a direct arterial road connection to Highway 401 and is intended in part for industrial traffic use, to keep trucks out of residential areas. We also note many successful industrial parks in
	 They possess an inferior location adjacent to an existing residential community; Adjacent to existing and proposed residential lands and potential for land use incompatibility; and, 	Brampton, Mississauga and Caledon are further away from the 401 and have built out well. The Region notes that the boundary between Derry Green Corporate Business Park and the planned residential follows a creek and existing natural protected area. This in our view is an appropriate separator, between industrial and
	These lands are fragmented due to substantive environmental constraints. There are other competitive and well-situated potential employment lands along the Highway 401 and Highway 407 corridors to take-up the employment land loss. Given these reasons, there is a need for the	residential uses. [A]

Source	Submission	Response
	redesignation to ensure that the Town of Milton and the Region of Halton can maintain competitive, well-situated and viable employment lands that can attract industries and jobs.	
	 Maintaining the employment land designation on the subject lands will provide a difficult interface with the Region's consideration for potential Mixed Use/Residential uses on lands north of Britannia Road immediately south and east of the subject lands; 	See above response. [A]
	3. Maintaining the employment land designation on the subject lands will frustrate the Town's ability to secure employment designations on more desirable and viable greenfield areas beyond the Highway 401 corridor, such as the Highway 407 and Tremaine Road corridors and related development synergy and objectives for achieving a mixed use Milton Education Village as well as the potential CN employment lands;	Based on the inventory of employment land figures, the Region believes that there is an overstatement of both existing and vacant employment lands. Our opinion is that these Derry Green Corporate Business Park lands will be needed for employment uses well before 2031. [B]
	4. The redesignation of the subject lands will enhance the overall impact of the employment lands north of Derry Road within the Derry Green Business Park as Derry Road corridor could be planned as a transit-oriented mixed-use corridor on the south side of this road to provide an appropriate land use interface with the prestige industrial uses along the north side of Derry Road, together with a transit-friendly node at the intersection of Derry Road and James Snow Parkway; and,	
	5. The Region's Sustainable Halton Plan process conforms to the Province's requirement that employment land conversion may be permitted through this comprehensive review. Furthermore, given that the Region is looking to provide additional employment land to meet expected demands into the year 2031, the subject lands are not required over the long term for the Town's and the Region's employment target purposes because more viable employment lands are available in the Town to meet the expected demands.	
	Further to the above planning rationale, the Province released the Paper on Planning for Employment to address employment area planning to appropriately implement the Growth Plan. The Province's vision for managing employment growth to the year 2031 is to proactively plan for employment that meet current and future land needs and to provide a framework for better planning for the appropriate location of industrial uses. The redesignation of the subject lands will not compromise the Province's employment vision and it coincides with the Province's vision for protecting viable and competitive	

Source	SUBMISSION	Response
	We recognize that the Region of Halton 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 to receiving your feedback on our submission and are eager to continue working 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 or comments.	A meeting with representatives from Trinison Management Corporation has taken place.
	Yours very truly,	
	GLEN SCHNARR & ASSOCIATES INC.	
Glen Schnarr and Associates Inc. for Trinison Management Corp., Fieldgate Developments, and Medallion Homes (Britannia South Lands) September 30, 2008	RE: Sustainable Halton Working Paper #1 - Locating New Urban Land Mixed Use/Residential Land Use Needs in the Town of Milton We are the Planning Consultant to Trinison Management Corp., Fieldgate Developments and Medallion Homes, who own lands south of Britannia Road (herein referred to as "Britannia South Lands") between Thompson Road and Sixth Line in the Town of Milton. The lands subject to our submission are located in the Town of Milton bounded by Thompson Road (Third Line) to the west, existing Milton urban boundary to the north, Sixth Line to the east and Lower Base Line to the south in the Town of Milton. The subject lands are approximately 1,400 hectares (3,500 acres) in size. Within this area, our clients own approximately 400 hectares (1,000 acres). Attached for your reference is a location map showing the subject lands. We have been participating in the Region's Sustainable Halton Plan process with respect to the Region's consideration for additional Mixed Use/Residential 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. All five growth concepts from the Region's Working Paper #1 shows the inclusion of the subject lands into the Milton Urban Area as Mixed-use/Residential. We support the Region's growth concepts as they pertain to our clients' lands. In addition to the rationale that are contained in the Region's Working Paper #1 to strongly consider the Urban Area inclusion of the subject lands, we would add the following planning rationale and justification for the Region's continued support for the inclusion of these lands into the Urban Area as	The planning rationale and justification for the inclusion of the subject lands into the Urban Area has been duly noted by Regional staff. The referenced lands are being considered as a potential location for new mixed-use/residential lands.

Source	SUBMISSION	Response
SOURCE	Mixed Use/Residential: 1. These lands provide an excellent opportunity to plan and provide a mixed-use nodes and corridors along Britannia Road and James Snow Parkway; 2. These lands promote the creation of complete communities that allow water and wastewater service provision from currently planned infrastructure; 3. These lands provide opportunities for well-integrated public transit and/or rapid transit systems along major road corridors and ensures cost-effective transit investments; 4. Crossings of the main branch of 16 Mile Creek are minimized and other valley crossings can be avoided thereby minimizing the impacts of growth on the natural environment; 5. The urban expansion of the subject lands is closest and contiguous to the existing Milton communities thereby reducing servicing costs (such as emergency services, fire, public library, etc.) and supports the efficient use of existing community infrastructure (such as schools, the hospital, transit services) and commercial services and reduce the cost of new community infrastructure; 6. The inclusion of the subject lands in the Urban Area continues to ensure that distinct communities through urban separators are maintained in Milton; 7. The subject lands as urban uses will support the proposed GO Station in Milton; 8. The inclusion of the subject lands in the Urban Area as Mixed-Use/Residential protects large tracts of farmland in Milton that provide a good connection to the Greenbelt; and, 9. The inclusion of the subject lands into the Urban Area will not negatively impact on the continued operation of the Eighth Line market garden/greenhouse area, which are unique components of the Region's agricultural sector. The Region asked the following questions in seeking response to the five growth concepts: 1. Do they capture Halton's Planning Vision of landform permanence? 2. Do they meet Halton's definition of sustainable development? 3. Do they promote complete, healthy and sustainable communities and the adequate provision of housing? 4. Do t	Working Paper #2: Concepts for Addressing Halton's Land Needs to 2031 (Report 3.08), prepared by Urban Strategies Inc, illustrates the refined Growth Concepts which show where new urban lands are being considered. The evaluation process, using the evaluation framework, will be used to evaluate the relative merits of proposed locations for new urban lands. Your comments on the evaluation framework will be considered in the evaluation process

Source	Submission	Response
Consultants for the Varga Family Farm Partnership et al. September 30, 2008	Part of East Half Lot 9, Concession 8, New Survey Trafalgar Town of Milton, Regional Municipality of Halton We are writing to you regarding the Varga Family Farm Partnership et at, owners of the subject property. The entire property is currently being farmed for agricultural crops by Mr. Frank Varga. Mr. Varga is an owner of the property, has farmed the land for over thirteen years and is also and OFA member #2927630. The Subject Property is traversed by a tributary of the 16-Mile Creek and associated Fill-Regulated area. The North-West corner of the site was a poorly drained grassed area which was utilized mainly for cattle grazing. Mr. Varga contacted Conservation Halton in May of 2004 as he wished to improve the drainage conditions in this area so it could be utilized to plant a cash crop. Mr. Varga walked the site with Mr. Bill Gaines and Ms. Joanne McHenry of Conservation Halton to investigate the existing drainage condition in the North-West corner of the site as well as the conditions of existing vegetation on the immediate vicinity. The site walk did confirm that part of the area was situated in a regulated area and also that the area was not located in an Environmentally Sensitive Area. Conservation Halton described the area as 'poorty drained scrubland' in correspondence dated June 22, 2004 which we enclose a copy of for your reference. At the conclusion of the site walk Conservation Halton confirmed the following: 1. The wooded area was not considered a 'woodlot' by definition in the Tree Conservation Bylaw and therefore is exempt. 2. Staff cannot formally object to the proposed farming activities (i.e. ploughing, crop growing and tile draining), under the condition that existing grades within the designated fill regulated areas are not altered by any other machinery other than that used for agricultural purposes. Site alterations and development to improve water quality as part of farm management enhancements are considered favourably provided a net benefit to the environment will result Upo	The landowner should note that the referenced lands are being considered as a potential location for new mixed-use/residential lands. Working Paper #2: Concepts for Addressing Halton's Land Needs to 2031 (Report 3.08), prepared by Urban Strategies Inc., illustrates the refined Growth Concepts which show where future urban areas are being considered. The evaluation process, using the evaluation framework, is being used to evaluate the relative merits of proposed locations for new urban lands.

Source	SUBMISSION	Response
		Road around the CN rail line. The Region is fortunate to have many areas that are well positioned for future employment (see Working Paper #2: Concepts for Addressing Halton Region's Land Needs to 2031, (Report 3.08) by Urban Strategies Inc.). Not all of these lands are required to meet the Region's employment land needs. The lands in the vicinity of 5 Side Road and the Fourth Line are not being contemplated for employment through Sustainable Halton. Staff note that this area is not readily serviceable due to the need to cross Sixteen Mile Creek. Staff also note that the creek provides a logical boundary for the urban area of Milton.
	We are also concerned with the extent of the Natural Heritage System shown on all the concepts as they affect the lands at the south west corner of Fourth Line and No. 5 Side Road. There has been no technical of scientific justification provided to demonstrate the need for the extent of lands included within the Natural Heritage System for these lands. We do not support this proposed designation. We look forward to working with the Region to develop a solution to our concerns.	In response to comments received on the Natural Heritage System, and in consultation with the Sustainable Halton Working Group (comprised of Regional staff, Local Municipal Planning staff, and Public Agency staff), the Halton Ecological and Environmental Advisory Committee, and the Halton Agricultural Advisory Committee, the Natural Heritage System has undergone a number of refinements. A report has been prepared that provides justification and an implementation framework for the Natural Heritage System (see Report 3.02: Sustainable Halton Natural Heritage System Definition and Implementation, by North-South Environmental).
		Direction is provided to aid final NHS boundary determination that will continue to meet the goal and intent of the NHS as currently mapped. Final determination of the NHS boundary will occur through future sub-watershed studies, secondary plan studies or other site specific studies. The preparation of detailed land use plans will allow final NHS boundary determination to take

Source	SUBMISSION	Response
		advantage of additional natural heritage information and analysis that will be available from the associated detailed field studies.
One Milton Trust October 1, 2008	Re: Sustainable Halton Comments We are writing to you on behalf of One Milton Trust Inc. to provide comments on the Sustainable Halton process and the five growth concepts being presented at the public open houses. We note that the Region of Halton is considering as part of this process the addition of 600ha of employment lands. As part of the current concepts under discussion is the extension of the employment lands north of James Snow Parkway in the Town of Milton. It is our understanding that the reason for consideration of these lands is that the lands would be readily available and would support the business park currently under development. It is our opinion that the lands south of No. 5 Sideroad at Fourth Line share many of the same qualities and would also be appropriate for consideration for inclusion within the industrial business park. Servicing is currently located a very short distance away and these lands could easily be brought on line.	Hemson Consulting Ltd has completed an updated land supply analysis. Based on additional information including 2006 Census data, as well as further analysis of the type of employment development occurring in Halton, the employment land needs has been increased to a total of 1,100 hectares. The detailed land supply analysis can be found in Report 3.07: Sustainable Halton: Accommodating Growth to 2031 by Hemson Consulting Inc. The proposed location of the 1,100 ha of employment lands has been determined in consultation with the Local Municipalities. The proposed employment lands are located along the Highway 401 corridor, north of Highway 401 along the future James Snow Parkway, along Highway 407 in east Milton, and along Tremaine Road around the CN rail line. There are a number of areas within the Region that are well positioned for future employment (see Working Paper #2: Concepts for Addressing Halton Region's Land Needs to 2031, (Report 3.08) by Urban Strategies Inc.). However, not all of these lands are required to meet the Region's employment land needs. The lands in the vicinity of 5 Side Road and the Fourth Line are not being contemplated for employment through Sustainable Halton. Staff note that this area is not readily serviceable due to the need to cross Sixteen Mile Creek. Staff also note that the creek provides a logical

Source	SUBMISSION	Response
JOURCE	We are also concerned with the extent of the Natural Heritage System shown on all the concepts as they affect the lands at the south west corner of Fourth Line and No. 5 Side Road. There has been no technical of scientific justification provided to demonstrate the need for the extent of lands included within the Natural Heritage System for these lands. We do not support this proposed designation. We look forward to working with the Region to develop a solution to our concerns.	Milton. In response to comments received on the Natural Heritage System, and in consultation with the Sustainable Halton Working Group (comprised of Regional staff, Local Municipal Planning staff, and Public Agency staff), the Halton Ecological and Environmental Advisory Committee, and the Halton Agricultural Advisory Committee, the Natural Heritage System has undergone a number of refinements. A report has been prepared that provides justification and an implementation framework for the Natural Heritage System: Definition and Implementation, (Report 3.02) by North-South Environmental). The NHS will be subject to further refinement through subsequent planning processes. Direction is provided to aid final NHS boundary determination that will continue to meet the goal and intent of the NHS as currently mapped. Final determination of the NHS boundary will occur through future sub-watershed studies, secondary plan studies or other site specific studies. The preparation of detailed land use plans will allow final NHS boundary determination and analysis that will be available from the associated detailed field studies.
Catholic Cemeteries of the Diocese of Hamilton October 7, 2008	Re: Sustainable Halton and Proposed Catholic Cemetery Owner: Catholic Cemeteries of the Diocese of Hamilton This is further to our letter dated April 22, 2008 which provided notice to the Region of the Catholic Cemeteries of the Diocese of Hamilton (the Diocese) interest in Sustainable Halton and the Diocese proposal to establish a long term cemetery in south Halton. On behalf of the Diocese, we are writing to provide additional comments in light of Working Paper #1, Locating New Urban Land and the response of the Town of Milton to the growth concepts.	Through consultation with the Sustainable Halton Working Group (comprised of Regional staff, Local Municipal staff, and Public Agency staff) and based on the future lands needs as determined through a detailed land supply analysis by Hemson Consulting, the area of Bronte Road and Lower Baseline

Source	Submission	Response
	As you know, the Diocese owns 50ha in south Milton on the northwest corner of Bronte Road and Lowe Baseline Road on which the long term cemetery is proposed. If is understood that the Town of Milton planning documents would regard a cemetery at this location, below the escarpment, as an urban use. It is with disappointment to the Diocese that these lands are not included in any of the five refined growth concepts as an urban expansion area. On the surface, there appear to be several alternative locations in Halton for large scale cemeteries other than designated urban area. The Region and Town of Milton Official Plans permit cemeteries above the escarpment but such a location is not practical to serve the Catholic community of south Halton due to remoteness from the community served, lack of good highway access, especially for the elderly and planning limitations on major structures such as a mausolea.	Road in south Milton is not being contemplated for urban growth between the years 2021 and 2031. Please also refer to the response to the Catholic Cemeteries of the Diocese of Hamilton submission dated September 12, 2008 (page 124 of this document).
	Cemeteries are also permitted in designated "Parkway Belt Areas" in south Milton and north Oakville. In these areas, the Diocese has recently revisited three large sites as identified by the Town of Oakville in 2001 and advises that none of these sites are reasonable available.	
	There is a need for a long term Catholic cemetery in south Halton given projected growth. From the Diocese perspective, it is not reasonable to expect these cemetery needs to compete with urban land values. The only practical option for the Diocese is to support a potential urban expansion encompassing the existing Diocese property in south Milton.	
	It is for these reasons that the Diocese supports to Town of Milton in its request for consideration of a Special Study Area in southwest Milton, identified as Area F on Appendix A to Milton report PD-076-08, dated September 22, 2008. On the understanding that the Halton land supply is to include allocation for "other urban uses", it is the position of the Diocese that consideration must also be given in such a study to the use of the Diocese lands as a long term cemetery.	
	We appreciate the opportunity to provide these comments on behalf of the Diocese and we will continue to monitor and participate in the Sustainable Halton plan process. We request that the Diocese be added to the Sustainable Halton mailing list and that the Diocese receive notification of any technical reports, open houses and public meetings. The Diocese also requests notification of any decision of regional Council concerning Sustainable Halton.	
Wellings Planning Consultants for Shorewood	Re: Sustainable Halton – Physical Structure Concepts 2021-2031 Shorewood Properties Inc. Southeast Corner of Trafalgar Road and Lower Base	

Source	SUBMISSION	Response
Properties October 10, 2008	Line Part of Lot 12, Concession 2 NDS Town of Milton (Formerly Trafalgar Township) Regional Municipality of Halton Our File No.: 2008/37	
	We are Planning Consultants for Shorewood Properties Inc. ("Shorewood"). Shorewood owns approximately 18 hectares (44.4 acres) of land located at the southeast corner of Trafalgar Road and Lower Base Line in the Town of Milton. The property is situated immediately north of Highway 407. I have attached a map showing the location of the property. The property is legally described as Part of Lot 12, Concession 2 NDS in the former Township of Trafalgar which now forms part of the Town of Milton.	
	I have reviewed the five (5) refined concepts and recently attended a public open house on September 16 th at the Georgetown District High School. In the workshop sessions conducted as part of the open house, I expressed some concern that the concepts while emphasizing the importance of Highway 401 in locating future employment lands did not adequately address the advantages and opportunities for employment uses along the Highway 407 corridor.	See below response [A] related to employment lands.
	The purpose of this letter will provide some general comments and observations on the Sustainable Halton process and examine the relative merits of including the Shorewood property and other lands along the Highway 407 Corridor as urban with the intent of accommodating future employment uses.	
	In terms of some general observations, I previously expressed concern regarding the use of the lower range of anticipated future urban land (i.e. 3,000 gross hectares) required to accommodate growth in Halton between 2021 and 2031. It is my opinion that the use of the lower range at this stage is improper as there is no information regarding the distribution of land use and the amount of natural heritage lands/features that will be deducted from the gross developable lands. As such, it is my view that the use of the upper range figure (4,200 gross hectares) at minimum is more appropriate as we have no appreciation or understanding at this time of the limiting factors and the resulting net developable land base.	Hemson Consulting Inc. has completed an update to the land supply analysis which has updated the land needs based on further data and analysis. The results of this analysis have increased the employment land needs to 1,100 hectares, while decreasing the mixed-use/residential land needs to 1,680 hectares. Please refer to Report 3.07: Sustainable Halton: Accommodating Growth to 2031, for a detailed explanation of the changes to the land supply.
	With respect to transportation corridors, I concur with the position put forth in the various refined concepts that Highway 401 is a key east-west corridor within the Region which makes it suitable for locating future employment land uses. However, I have a fundamental concern with the lack of recognition of	The Region is fortunate to have many areas that are well positioned for new employment uses. However, in consultation with the Local Municipalities, the Highway 401 Corridor (including lands along the

Source	Submission	Response
	Highway 407 as a key transportation corridor which I believe is equally suited for future employment uses. The various concepts do not address the importance of Highway 407 for future employment uses. Although Highway 407 is a toll highway, this should not take away from its importance as a key transportation corridor which in my view should be considered equally with the Queen Elizabeth Way to the south and Highway 401 to the north. Being a frequent user of Highway 407, I can attest to the fact that this highway has experienced significant ridership increases with Halton and beyond.	future James Snow Parkway), lands along Tremaine Road in south Milton, adjacent to the rail line, and along Highway 407 in east Milton, recognizing the importance of this transportation corridor in addition to the Highway 401corridor, were identified as priority areas to fulfill the employment land needs to 2031. [A]
	Shorewood Lands	
	The Shorewood lands are strategically located immediately north of Highway 407 and close to the interchange of Trafalgar Road and Highway 407. The location of the property to key transportation corridors and existing road infrastructure in itself makes these lands a strong candidate for employment uses.	Trafalgar Road is a key corridor in the Region and the focus of future investment by both the Region and the Province in terms of servicing and public transit.
	You will be aware that the lands south of Highway 407 within the Town of Oakville are contemplated for employment uses. It makes sense that land uses on the north and south sides of Highway 407 are consistent. Additionally, Trafalgar Road is a Regional road that serves a key transportation linkage between north and south Halton while Highway 407 is clearly important for the east-west movement of people and goods through Halton.	The Region also recognizes the importance of future strategic employment lands beyond 2031, and will be identifying these through policy as part of the statutory five year Official Plan Review process.
	Town of Milton Position	
	As you are aware, Town of Milton Council recently adopted the recommendations of Staff Report PD-076-08. The concepts adopted by the Town supports the principle of employment uses along the Highway 407 corridor. Town Planning staff indicated in their report that industrial/warehousing and low-rise office campuses are envisioned along Highway 407 "in order to take advantage of the direct exposure to Highway 407 and relative access to the same." Town staff further note that "the potential employment uses (along Highway 407) compliment the designated employment area located just south of Highway 407 within the approved North Oakville Secondary Plan Area." (bracket added).	Based on the extent of employment land needs identified through the updated land supply analysis, the determination of the location for the 1,100 hectares of employment was carried out in consultation with the four Local Municipalities.
	We concur with the position of the Town of Milton and strongly believe that not taking advantage of the lands along the Highway 407 corridor for employment uses is inappropriate and amounts to a lost opportunity to attract quality employment uses in the near future.	
	Conclusions	
	In conclusion, we believe that the Sustainable Halton process should be considering at a minimum the upper limits of urban	

Source	SUBMISSION	Response
	growth (i.e. 4,200 hectares) as the limiting factors (i.e. amount of publicly owned land, natural heritage features etc.) have not been determined and the net development acreage is unknown at this stage of the process. Due to the complexities and effort involved in the Sustainable Halton process, it would be unfortunate to discover in advance of 2031 time horizon that insufficient urban lands were set aside for future growth. We strongly support the provision of employment lands along all Provincial highways within Halton Region including Highway 407. With respect to the Shorewood lands, these lands are strategically located to accommodate employment uses. The Shorewood property is situated along Highway 407 and in close proximity to the interchange of Trafalgar Road and Highway 407. The lands also abut Trafalgar Road which is a key north-south transportation corridor serving Halton Region. These factors support the inclusion of these lands within the urban fabric for employment use. Thank you for your consideration of this matter. We trust you will take our comments into consideration and would ask that you notify us of any future meetings/reports with respect to the Sustainable Halton process.	
Ruth Victor for Mr. and Mrs. Victor Enns January 5, 2009	Re: Sustainable Halton – Mr. and Mrs. Victor Enns I am writing to you on behalf of Mr. and Mrs. Victor Enns the owner of 1300, 1326, 1326, and 1342 Bronte Road. As you are aware Mr. John Ghent is the planner of record for Mr. Enns and has assisted Mr. Enns with a number of Parkway Belt West Plan matters. Mr. Enns has asked me to provide additional assistance with regards to his concerns on the Sustainable Halton mapping that has been provided to date. On all of the concepts provided to date, Mr. Enns property has been shown as part of the Natural Heritage System designation. Although these lands are located west of Bronte Road and are surrounded by environmental features to the west and south, the lands themselves, excluding the woodlot area, have been developed for single detached residential uses. These lands do not contain environmental features, successional habitat nor are they appropriate for ecological restoration. These lands are located within the Parkway Belt West Plan area. The land use designation within the Regional Official Plan for these lands is deferred. An application was submitted in April 2005 to remove the lands from this Plan but no significant progress has been made on that application. At this time, the applicable land use designation is under the Parkway Belt West Plan. The subject lands are designated as Genera Complementary Use Area in the Plan and not Public Open Space and Buffer Area as all of the other lands west of	Thank you for your submission regarding the properties located at 1300, 1316, 1326 and 1342 Bronte Road in Oakville. The Region is continuing to work with Town of Oakville staff with respect to the Natural Heritage System within the Town of Oakville. We note that these properties are located within the existing Town of Oakville urban boundary, that there a variety of natural features present on the properties, and that a portion of the land is located within the Provincial Greenbelt. We look forward to receipt of the further information that will be provided regarding these lands as mentioned in the correspondence from Mr. Blair Taylor

Source	SUBMISSION	Response
	Bronte Road. From the time of the Parkway Belt West Plan preparation, there has been an acknowledgement that the lands are different that the other environmentally significant lands west of Bronte Road. This fact was also recognized in the mapping for the Greenbelt Plan which specifically excludes these lands from the Greenbelt Plan area. The Places to Grow Plan shows the lands as within the Greater Golden Horseshoe Growth Plan Area on Schedule 1. As noted previously, the Greenlands B designation within the Regional Official Plan is not in effect. In addition, these lands do not meet the criteria for designation of Greenlands B as set out in Section 130 of the Regional Official Plan. As noted above, they have been developed already for single detached dwellings. These lands are not appropriate to be included within the Natural Heritage System as part of the Sustainable Halton process. As these lands contain single detached dwellings which are already serviced by municipal water and wastewater services, the appropriate lands use designation is Urban Area.	dated March 31, 2009 (See Attachment #3, Page 275). Upon receipt of the further information we would be pleased to discuss this matter with you in further detail.
Weston Consulting Group Inc. on behalf of Mr. Rocco Busiello January 12, 2009	Re: Sustainable Halton – Growth Management Plan (Phase 2) Town of Milton 2518 Lower Base Line Weston Consulting Group Inc. (WCGI) is the planning consultant for Mr. Rocco Busiello, the owner of 2518 Lower Base Line Road, in the Town of Milton. On our client's behalf, we would like the Regional Municipality of Halton to recognize the economic viability and importance of the CN Rail lands, as well as the surrounding lands to the east, and designate these lands as and Employment Are through its Sustainable Halton review. Upon reviewing the more recent staff report LPS36-08, dated 15 October 2008, we note the nine initial growth concepts for new Employment and Urban Land have been reduced to five. We also note that CN has submitted a proposal for their lands bounded by Britannia Road, Tremaine Road, Lower Base Line Road, and First Line in the Town of Milton for a direct rail service industrial park; such a proposal would be best suited within an Employment Area. Two of the original nine concept plans, specifically No. 6 – Milton Centred Expansion and No. 7 – Milton South, were identified in the Region's staff report (PPW42-08), dated 3 June 2008, as support the establishment of and Employment Area containing the CN lands and the surrounding lands to the east. These areas are ideally suited for Employment land uses with employment supporting Commercial land uses on	Hemson Consulting Ltd has completed an updated land supply analysis. Based on additional information (which included previously unavailable 2006 Census data), as well as further analysis of the type of employment development occurring in Halton, the employment land needs has been increased to a total of 1,100 hectares. The detailed land supply analysis can be found in <i>Report 3.07: Sustainable Halton: Accommodating Growth to 2031</i> , by Hemson Consulting Inc. Included in the 1,100 ha is approximately 200 ha of employment along Tremaine Road in south Milton, adjacent to the rail line. [A] The Region is fortunate to have many areas that are well positioned for future employment uses (See Figure 4.2 of <i>Working Paper #2: Concepts for Addressing Halton's Land Needs to 2031, (Report 3.08)</i> prepared by

Source	Submission	Response
	the Regional Roads. We believe the CN lands, and the surrounding area to the east, are ideal for new expanded Employment lands. As stated in the background report entitled <i>Urban Structure:</i> Potential Long Term Growth Areas, dated November 2007, prepared by Hemson Consulting, the CN lands, and surrounding area, has "existing transportation advantages in its proximity to Highway 407. If the CN Intermodal terminal is built, that would add a very significant additional transportation advantage."	Urban Strategies Inc.) The 401 Corridor (including lands along the future James Snow Parkway), the Highway 407 corridor in east Milton, and lands adjacent to the rail line in south Milton have been identified by the Region and the Local Municipalities as priority areas for new employment lands to meet the Region's needs to 2031. However, the Region also recognizes the importance of protecting strategic employment lands beyond 2031 and will be providing protection through the Region's statutory five year Official Plan Review process.
		Through their submission dated September 12, 2008, CN has advised that they are not intending to develop an intermodal facility, but rather a rail based employment area.
	The Town of Milton has been identified as the fastest growing municipality, in relative terms, growing and an average annual rate of 14.3 percent. The Provincial Growth Plan calls for Halton Region's population to reach 650,000 by 2021, and 728,000 by the year 2031. In contrast, Halton Region has forecast a Regional population of only 638,900 by the year 2021.	For information on the forecasted population and employment growth to 2031, please refer to <i>Report 3.07:</i> Sustainable Halton: Accommodating Growth to 2031, by Hemson Consulting Ltd.
	According to the report entitled, <i>The Benefits of Developing CN's Lands in Milton</i> , produced by The Centre for Spatial Economics, dated September 2008, if the Town of Milton preserves a current employment rate of 459 jobs per 1,000 residents; then the Town's population projection to of 250,000 people by the year 2031 will require an increase of approximately 90,000 jobs between 2006 and 2031. The Region, however, has forecasted Milton's employment base increasing to 71,000 by 2021. This represents a significant shortfall in employment opportunities in the Town.	The number of jobs forecasted for the Town of Milton between 2021 and 2031 is being determined through the Sustainable Halton process. The Region is unclear of what is meant by a shortfall in the comparison of 2006 – 2031 figures with 2021 figures.
	Thus, the Region must accommodate the projected growth through increasing its employment lands accordingly. In its preliminary review, the Region has determined an additional 3,000 hectares of new urban lands (600ha of which is to be for employment use) will be needed to meet the targets for population as projected by the Growth Plan. It is our opinion that the CN lands will provide the Region with an attractive employment area for manufacturing, automotive, export-based industries as well as providing prime areas for imports to be brought into the area for like services that would benefit from	See previous response. [A]

Source	SUBMISSION	Response
	the proximity to the rail lands. In addition, the additional Employment lands will help address the shortfall identified above.	
	No rationale was provided in the Region's LPS36-08 staff report as to why these lands were not considered for inclusion within the employment area expansion. Given the insufficient allocation for employment lands discussed above, WCGI strongly recommends the Region increase the amount of employment lands necessary to accommodate the projected growth to the year 2031 by reconsidering the CN lands, and surrounding eastern lands, to be designated as expanded Employment lands.	See previous response. [A]
	Please do not hesitate to contact me should you have any questions or concerns.	
M.A.M. Group January 26, 2009	RE: Milton 7-5 Holdings Inc. & Tarapark Developments Corp. Business Park II – Town of Milton Sustainable Halton – Phase III	
	We are writing on behalf of Milton 7-5 Holdings Inc., and Tarapark Developments Corp. who own lands south of Derry Road in the Business Park II planning area in the Town of Milton. Further to an initial meeting with Anita Fabac and Perry Vagnini, we respectfully submit an analysis prepared by urbanMetrics Inc., supporting the options for conversion from employment uses to mixed-use/residential uses on the lands south of Derry that were identified through the Sustainable Halton process. Recognizing that a specific analysis of the conversion options was beyond the scope of the Sustainable Halton background work prepared by Hemson Consulting Inc., urbanMetrics Inc. was retained to assist the Region's consideration of the appropriateness of the conversion, and to provide a rationale as to how the conversion meets the employment land conversion tests set out in both the Provincial Places to Grow plan and the 2005 Provincial Policy Statements.	With respect to the redesignation of the southern portion of Milton's Derry Green Business Park, through Town of Milton staff report PD-076-08, dated September 22, 2008, Milton Council resolved to keep these lands as employment as designated in the current official plan. Thus, a redesignation from employment to residential is not contemplated and has not been considered in the refinement of the Growth Concepts.
	The analysis provided by urbanMetrics was largely based on a supportive of Hemson's initial background work, and concluded that conversion to mixed-use residential is warranted provided that other suitable employment lands can be designated through the Sustainable Halton proves. Given that other more viable and desirable employment lands have been identified, the proposed conversion would meet the test set out in both provincial policy documents by still allowing Halton Region to meet the employment forecasts allocated in Places to Grow.	
	Furthermore, urbanMetrics also notes that conversion will a) not have any significant adverse impact on the viability of surrounding or adjacent employment uses, b) can make	

efficient use of existing and planned infrastructure close to the existing residential community immediately to the west of the subject lands, and c) would help reduce the need to expand the urban boundary for new mixed-use/residential lands beyond the lands identified in the five refined concepts. We very much appreciate that staff have agreed to continue to meet with the private sector to discuss submissions on the five refined concepts that emerged from through Phase II of the Sustainable Halton proves, and we also agree that the refined 2 to 3 land use options that staff intend to make available for Councils consideration should be based on sound technical information. We believe that the option to convert the above mentioned lands from employment to mixed-use/residential is based on sound technical information, and that it respects the principles outlined through the Sustainable Halton process, and represents good planning in general. As such, along with the submission of the attached technical report, we are requesting that staff include the subject lands as mixed-use/residential in their refined land use options and thank you and your staff for meeting with us. Thank you for your time and we look forward to working with staff moving forward. We are available anytime to provide any additional information you may require. Supporting technical report: 1. Employment Land Needs Analysis – Urban Metrics (January 20, 2009) Supporting technical report: 1. Employment Land Needs Analysis – Urban Metrics (January 20, 2009) Line of the employment lands, or whether they are areal varging for a trader of location of the employment lands, or whether they are really arging for a trader of location of the employment lands, or whether they are really arging for a trader of location of the employment lands, or whether they are really arging for a trader of location of the employment lands, or whether they are really arging for a trader of location of the employment lands, or whether they are really arging for a tr	Source	SUBMISSION	Response
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number of arguments as to why these lands are uncompetitive and		Employment Land Needs Analysis – Urban Metrics	other views expressed about this assumption). This confuses their position, as we are uncertain whether they are really arguing for a "trade" of location of the employment lands, or whether they are not needed at all. On page 5, in the third paragraph, there is a statement that there is some kind of imbalance because the Phase I work suggested needing more residential land than employment land. The only balance of urban land uses to be sought through this process is for the Region and the Town on a municipal wide basis at full development of an official plan area. There is no policy basis to suggest some kind of balance needs to be struck within the new lands being designated at the margin of the full urban land base. Page 6 and 7 provide a number of arguments as to why

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		Plan and PPS with some of the arguments provided. Again, the difference between could and should is critical here.
Weston	Attention: Mayor Rob Burton	
Consulting Group Inc.	Re: Employment Lands Shortage in Milton	
February 3, 2009	Thank you for your letter of January 19. I appreciate your feedback and questions. My initial letter was based on the research undertaken by the Centre for Spatial Economics (C4SE) in their September 2008 submission to Halton Region. Their report states that the current employment rate for the Town of Milton is currently 459 jobs per 1,000 residents. This is consistent with the Town of Milton's submission (PD-076-08) dated September 22, 2008) which states a goal of maintaining an employment ratio of 0.5, or 500 jobs per 1,000 residents.	
	The Places to Grow Plan establishes a planned population of 650,000 by 2021 in the Halton Region. This is forecast to grow by an additional 20% to 780,000 by 2031 in the Plan. The Region, in their 2007 Best Planning Estimates only forecast a Region-wide population of 628,000 for 2021. Thus, the Region's forecasts are below the population forecast required by the Places to Grow Plan.	
	There is a need to extrapolate beyond the Region's forecast to be consistent with the Places to Grow Plan goals. Given that the Town of Milton is a major focus for growth in the Region, especially given the constraints on Burlington and Halton Hills, the C4SSE report speculates that 2031 population for the Town of Milton 'could exceed 250,000 people'. If the employment rate of 459 jobs per 1000 population is maintained, this would require 114,750 jobs by 2031.	
	The April 2007 Best Planning Estimate forecast an average annual job increase of 2,480 jobs per year for Milton between 2007 and 2021 reaching a total of 71,000 jobs in 2021. Extrapolating this growth rate, for an additional 10 years, results in the Region's forecast of 95,800 jobs in Milton in 2031. This is significantly less than that which is required using the Places to Grow Plan forecast and therefore results in a significant employment shortfall of almost 19,000 jobs.	
	While there is room for debate on the actual 2031 population for the Town of Milton, this approach is solidly based on the Places to Grow Plan forecasts. Regional forecasts are currently below the Places to Grow Plan numbers and will likely need to be increased in future conformity exercises. For example, in a meeting with Mr. Ho Wong yesterday, he indicated that the Region is now looking to include 800 ha of Employment Lands through the Sustainable Halton process. This is an increase of 33% over the original target of 600 ha	Hemson Consulting Ltd has completed an updated land supply analysis. Based on additional information (which included previously unavailable 2006 Census data), as well as further analysis of the type of employment development occurring in Halton, the employment land needs has been increased to a

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	and will more accurately align with the Places to Grow forecasts. I hope this clarifies my position.	total of 1,100 hectares. The detailed land supply analysis can be found in Report 3.07: Sustainable Halton: Accommodating Growth to 2031.
	Yours truly, Weston Consulting Group Inc.	It should be noted that in making any further recommendations on urban land designations, Sustainable Halton is subject to the constraints of the quantum of land required for employment uses and the desirable characteristics of locations.
Glen Schnarr for Orlando Corporation February 17, 2009	We are the Planning Consultant to Orlando Corporation and our submission herein is further to our previous letter to Anita Fabac dated September 20, 2008 and our meeting with you, Anita Fabac and Perry Vagnini on January 22, 2009, We had advised you at the January 2009 meeting that we have initiated a technical analysis to evaluate Hemson's Sustainable Halton Land Supply Analysis dated November 2007 and to assess that Hemson's suggestion to accommodate 600 gross hectares of additional employment land outside of the existing urban boundary would be sufficient to accommodate the anticipated employment demand in Halton Region to the year 2031.	
	Introduction: We understand that the Region is currently undertaking a land budget analysis to assess the vacant supply of usable employment land within the existing urban boundary. We also understand that staff are reviewing Hemson's 2007 land supply analysis report to confirm if 600 gross hectares of employment land will be sufficient to accommodate the projected employment in the Province's Growth Plan for the 2031 planning horizon. Halton staff have indicated that these works will be completed in the next few weeks. To reiterate some of our previous comments to the Region on the long-term employment land needs:	Hemson Consulting Ltd has completed an updated land supply analysis. Additional information (including previously unavailable 2006 Census data) and further analysis of the type of employment development occurring in Halton, has resulted in an increase of the employment lands needs to a total of 1,100 hectares. The detailed land supply analysis can be found in <i>Report 3.07: Sustainable Halton: Accommodating Growth to 2031.</i>
	 we support the 'permanent' long term protection (beyond 2031) of well-located and competitive employment land that will attract industries and will be developed expediously. We are concerned that the 600 hectares (1,500 acres) of 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; and, 	The Region is considering other policy directions to protect future employment lands that may be needed beyond 2031, including a provision that may bring these lands into the urban areas before 2031 without the need of a comprehensive review of the Official Plan.
	We believe that an average density of 37.5 employees per net ha used by Hemson Consulting Ltd. to determine the Regional employment land needs is not appropriate specifically for the employment land that we anticipate will be	The updated land supply analysis undertaken by Hemson Consulting Ltd. included further analysis of the type of employment development presently occurring in Halton,

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	required in Halton Region. IBI Study Findings: Attached to our letter is the Final Report prepared by IBI	recognizing the lower employment density common to distribution, logistics and energy type employment uses.
	Group, in collaboration with The Centre for Spatial Economics dated February 9, 2009 that provides their evaluation of the future employment land needs in Halton Region to the year 2031. You will note that we are not challenging the employment forecast prescribed in the Provincial Growth Plan for Halton Region. The attached report by IBI Group has determined that significantly more employment land is needed than Hemson's recommended 600 gross hectares to accommodate the mix of employment uses, particularly the growing warehousing/logistics and wholesale trade sector in Halton Region. In brief summary, the IBI Group's report provides four main differences to the Hemson approach in deriving at a different employment land needs. They are:	The Region's position of including 1,100 hectares of employment instead of any larger area reflects a good balance between our recognition of realistic employment densities and the requirement of minimum Greenfield density as mandated by the Places to Grow Plan.
	I. Hemson used a base employment figure of 226,000 jobs for 2006 whereas the Census Statistics Canada figure was 215,055 jobs for 2006, which is a more accurate figure and the Census numbers was 11,000 jobs less than Hemson's estimates. This means that the difference of 11,000 jobs needs to be accommodated in the future employment land needs analysis beyond what Hemson has calculated;	Addressed in the above noted Hemson Consulting Inc. report.
	2. A frictional vacancy factor of 15% is more realistic of future market conditions than Hemson's assumption of 10% vacancy factor and the 15% vacancy factor is consistent with the existing mature state vacancy scenario in the GTA;	Hemson Consulting Ltd. contends that a 5% frictional vacancy (long-term land vacancy) would apply. Hemson notes that they have done extensive work with the City of Toronto on employment lands and the conclusion of that work supports the 5% assumption.
		Hemson also notes that in their work, they accounted for vacancy and under-utilization or change in use by only calculating employment capacity at 90% of land area development. Half of the discount (5%) is an assumption of long-term land vacancy to account for lands that are never developed. This is a well established phenomenon in all urban land markets. The other half of the discount (5%) is for under-utilization and changes in use.
	Hemson's assumption that there will be a reduction in the percentage of future jobs within the employment land	Hemson Consulting Ltd. notes that their approach to forecasting is that

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	employment sector from the current 60% of the total employment in Halton Region to approximately 50% by 2031 is inconsistent with historic trends and the current mix; and,	they forecast at the metropolitan level three categories of employment – major office, employment land and population related – and then each is independently distributed among the Regions and Cities of the GTAH according to market and policy assumptions. Therefore, the percentage of employment land employment of the total is not an assumption used in calculating and preparing the forecast, but rather a result of however the three employment components happen to be distributed.
	4. Within the employment land employment category, the warehousing/logistics and wholesale trade sector will become even more important in Halton based on the work prepared by C4SE;	Addressed in the above noted Hemson Consulting Inc. report.
	5. We believe the employment density (i.e. jobs per gross hectare) within warehousing/logistics and wholesale trade is declining due to automation of these industrial facilities and certainly cannot be expected to achieve the densities assumed by Hemson. As such, a separate employment density factor should be utilized recognizing the unique space factors for warehousing/logistics and wholesale trade.	Addressed in the above noted Hemson Consulting Inc. report.
	Based on these differences in factors, the ISI Group concludes that the Region needs to provide approximately 2,400 gross hectares of employment lands to accommodate future employment land needs in Halton Region to the year 2031 as prescribed in the Provincial Growth Plan.	
	Locational Attributes for Employment Lands Employment:	
	Although we have previously advised the Region on the key attributes that achieve competitive and viable employment lands in Halton Region, we feel that these key factors are worthy of reiterating as follows:	
	The importance of Highway 40 I corridor and associated road access and linkage to creating a viable employment opportunity in the west GTA market. The major land use within the west GTA employment lands is distribution and warehousing due to the movement of goods from USA into Canada through the Windsor bridge along the Highway 401 corridor. The desire and need for distribution and warehousing space in close proximity to Highway 40 I will continue through the 2031 planning horizon;	The importance of the Highway 401 corridor is reflected in the identification of proposed employment along the Highway 401 corridor in each of the refined Growth Concepts (Please see the report, Working Paper #2: Concepts for Addressing Halton Region's Land Needs to 2031, (Report 3.08) by Urban Strategies Inc.).

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	The creation of viable employment lands surrounding the CN and CP Intermodal facility (Le. the employment land potential on the south side of CP Intermodal to Derry Road and the employment land potential on the west side of Tremaine Road opposite CN Intermodal); and,	Through their submission dated September 12, 2008, CN has advised that they are not intending to develop an intermodal facility, but a rail based employment area. Of the 1,100 ha of employment land needs identified, approximately 200 ha is located in south Milton along Tremaine Road, adjacent to the rail line.
	Opportunities for the integration of labour/job intensive prestige industrial and office centres at key arterial intersections in close proximity and access to provincial highways;	Sustainable Halton is planning for these types of employment uses at key nodes in close proximity to residential uses and important transit and transportation infrastructure.
	Flat or gently sloping and contiguous parcels of employment land are more conducive to attracting large-scale industries and businesses;	
	Unencumbered employment lands from natural environmental constraints (i.e. potential employment lands between 8th Line and Highway 407 south of Derry Road to Britannia Road) attract large-scale industries and businesses; and,	
	Recognition of physical development and servicing constraints and related higher development and servicing costs resulting from the existence and proximity to natural features and the Natural Heritage System linkages and core areas and their impacts to creating a viable and competitive Halton employment lands within the GTA market.	
	Based on initial examination of spatial and locational attributes of the four local municipalities in Halton Region, it is the opinion of the IBI Group that the Town of Milton will be most successful in attracting a mix of employment, particularly related to the warehousing/logistics and wholesale trade sector. A more detailed examination of Halton's employment competitiveness is provided in the economic report prepared by The Centre for Spatial Economics and the more detailed findings have been summarized in the conclusion of that report.	
	In closing, we trust that our submission will assist the Region in ensuring that an appropriate amount of employment land is provided outside of the existing urban area to ensure that sufficient and competitive employment land supply is planned and accommodated in Halton Region to the year 2031. We request that our submission along with the work undertaken by IBI Group and The Centre for Spatial Economics be considered as part of the Region's review of the existing employment land budget analysis and the review of	

Source	SUBMISSION	Response
Alvaro DeBlasio for Atkinson/ DePaoli March 2, 2009	Hemson's employment land supply analysis. We would be pleased to meet with you and your staff to discuss our submission in more detail. Please call us if you have any questions Yours very truly, GLEN SCHNARR & ASSOCIATES INC. Supporting technical reports: 1. Region of Halton Employment Land Needs Analysis – IBI Group (February 9, 2009) It was a pleasure meeting with you to discuss the Region's SHP process and my interest in the Atkinson/DePaoli properties being considered for future development in Halton Hills. As discussed with you, our company currently owns the Atkinson property. We had entered into an Agreement of Purchase and Sale to acquire the lands located south of the CNR tracks on the DePaoli property, which was the subject if a consent application. I wanted to advise you that we have decided not to proceed with the acquisition of this property and therefore, we no longer have any interest in pursuing the Consent Application. As such, if not done so already by Bert Arnold, I have advised him to withdraw the Consent Application. I trust that this now enables the Region to appropriately respond to our written request to you and your colleagues that we are interested in the Region's and the Town's consideration of future development of the Atkinson/DePaoli properties. I understand from my Planner that the Region may be releasing a short-list of growth options in early April and I am looking forward to how our request will be addressed through that release. Thanks kindly and we look forward to working with you and your colleagues	The subject properties are outside of the limits of the Sustainable Halton Primary Study Area. The Town of Halton Hills has responded to correspondence regarding the Atkinson/DePaoli Properties in staff report PDS-2008-0065. The Town of Halton Hills advised of two options for the development of the subject properties – to incorporate Stewarttown, including the subject lands, within the Georgetown Urban Boundary, or to consider the request in the context of Hamlet expansion policies. The Region suggests that further consideration of the request take place in the context of future local urban structure planning. The Town will be further consulted on this matter.
LIND Urban Land Management March 16, 2009	Thank you for meeting with Bill Stensson, Rick Friesen and me on March 9, 2009. For the record, others in attendance were Mayor Rick Bonnette of Halton Hills, Ho Wong and Anita Fabac from Planning Services and John Davidson from Halton's Business Development Centre. It is our understanding that your department will be finalizing its' recommendation to Halton Regional Council soon with respect to the Sustainable Halton Land Use Concepts. The purpose of this letter is to formally request Halton Region	

Source	SUBMISSION	Response
	employment lands a limited area of @ 50 to 100 ha between 10th line and Winston Churchill Blvd south of Norval.	
	BACKGROUND	
	To begin, we would like to refer to the policy of the Town of Halton Hills in the recently approved Halton Hills Official Plan on the issue of Employment Land, and specifically the last point: "D3.3 SUPPLY OF LAND	
	It is the intent of this Plan that an adequate supply of employment land is available at all times in the Town. At the time this Plan was adopted by Council, almost all of the employment land in Georgetown was developed. In Acton, additional development was feasible, but the amount of development that could occur was limited by servicing constraints. The only area that could accommodate large-scale employment growth is located within the 401/407 Employment Corridor Area. On the basis of the above, it is a policy of this Plan to:	
	a) ensure the designation of sufficient lands to meet the employment target established by this Plan;	
	b) not consider applications that facilitate the conversion of lands within the Employment Area designation to non-employment uses outside of a municipally initiated comprehensive review of this Plan;	
	c) to not support the re-designation of any land from the Employment Area designation to non-employment uses that would compromise the Town's ability to meet the employment target established by this Plan;	
	d) carefully monitor employment trends in the Town, the Region and the Greater Toronto Area to determine whether the Town is well-positioned to take advantage of these trends; and,	
	e) determine whether it would be in the public interest, feasible and supportable from a needs perspective to designate additional lands in the Georgetown Urban Area or vicinity to foster a greater live-work relationship in the Town's largest urban area." (italics added)	
	The Region of Halton also spoke to this point in the "Sustainable Halton Working Paper #1: Locating New Urban Land (Region of Halton, 2008)", and stated the following:	Hemson Consulting Ltd has completed an updated land supply analysis. Based on additional information (which included
	"Figure 4 illustrates the areas that have the highest potential for supporting new employment uses including areas along the 400 series highways and near the CN rail corridor in south west Milton. All of the potential future employment lands, when identified together, represent a resource larger than the	previously unavailable 2006 Census data), as well as further analysis of the type of employment development occurring in Halton, the employment land needs has been increased to a

Source	Submission	Response
	600 hectares needed to accommodate employment growth between the years 2021 to 2031. The remainder of the employment lands should be strategically protected in anticipation of demand for employment land beyond 2031."	total of 1,100 hectares. The detailed land supply analysis can be found in Report 3.07: Sustainable Halton: Accommodating Growth to 2031.
		The Region is fortunate to have many areas that are well positioned for new employment uses (See Working Paper #2: Concepts for Addressing Halton's Land Needs to 2031, (Report 3.08) prepared by Urban Strategies Inc.) The 401 Corridor (including lands along the future James Snow Parkway), the Highway 407 corridor in east Milton, and lands in south Milton adjacent to the rail line, have been identified by the Region and the Local Municipalities as priority areas for new employment lands to meet the Region's needs to 2031
	The Sheridan Norval Farm of 34 Ha (83 acres), including a 12 acre lake, is situated near the northerly corner of Winston Churchill Boulevard (WCB) and 10 Sideroad, within the above mentioned areas which should be protected for long term employment lands.	The protection of future employment lands beyond 2031 is an important consideration. The Region will be providing protection through the Region's statutory five year Official
	Mr. Bill Stensson, President, made a presentation to Halton Hills Council on September 24, 2008 wherein he outlined a proposal to join with neighbouring landowners to designate approximately 50 to 100 ha of land fronting on Winston Churchill Boulevard (WCB) for a high quality office business campus which would address a number of long range planning and employment issues raised throughout the Sustainable Halton Process.	Plan Review process.
	Town of Halton Hills Council passed the following Resolutions:	
	2008-0189 Moved by C. Somerville Seconded by J. Robson	
	THAT the presentation by Sheridan Nurseries be received and forwarded to the Region of Halton for consideration as part of determining the start list of options;	
	AND FURTHER THAT staff report back on the long-term strategy for identifying employment lands for the Town of Halton Hills.	
	2008-0190 Moved by J. Fogal Seconded by D. Kentner	
	" That whereas areas in Georgetown are essentially built out, that the Town staff and the Region include in an assessment	

Source	SUBMISSION	Response
	of growth options the need to designate an employment area as part of the Georgetown Urban Expansion Plan in order to meet the goal of creating complete communities in addition to employment areas designated in the 401 corridor."	
	WHY ARE THESE PARTICULAR LANDS UNIQUE? By anchoring an Office Campus just south of the Hamlet of Norval, at the south-east gateway to Georgetown, we take advantage of a number of sound planning characteristics:	
	Plans for an enhanced north-south transportation route from 401/407 near Winston Churchill Blvd known as the Bramwest Corridor are currently in the Environmental Assessment Planning Stage;	
	2. Plans for the GTA West Corridor are also in the study stage and will likely link up with any major road corridor near Winston Churchill Blvd.;	
	3. Possibility of connecting sewer and water to Region of Peel's lake based system ahead of similar servicing originating from the Region of Halton at a lower cost to the Region. Secondary Plans fronting onto the Brampton frontage of WCB are already approved and servicing is now scheduled into their Capital Works budgets;	The purpose of staff report PPW 30- 08 was to make Council aware that the Commissioner of Public Works and Engineering Services would initiate discussions with the Region of Peel to explore the potential for
	4. Locating a higher density office business park close to the existing residential communities of Halton Hills enhances the concept of sustainability by reducing traffic congestion and commuting time;	servicing growth areas from the Region of Peel's water and wastewater systems. These options would be included for consideration through the Sustainable Halton
	5. As a buffer between potential future residential and agricultural areas in south Halton Hills and the soon to be built-up urban area of Brampton West, and;	process. [A]
	6. Utilizing the existing pond and stream system as a focal point retains a unique environmentally sensitive corridor and allows a higher level of urban design and the possibility of (LID) Low Impact Development through the stewardship of open space amenities.	
	Summary of Key Points	
	Existing agricultural land being impacted by urban encroachments; environmental (noise, salt runoff, traffic, etc) and economic (fewer young farmers, increasing costs, property taxes etc.)	
	2. These 4 parcels (Carter, Sheridan, Arnold and Brander) are strategically located at Eastern Gateway to Georgetown near the future convergence where Winston Churchill Blvd, Hwy #7 and the future Halton/BramWest Corridor come together (see map)	

Source	SUBMISSION	Response
	3. Servicing of the approved urban areas within Peel are already planned for west Brampton and discussions are being held between Halton and Peel Regions to look at cost sharing these lake-based sewers for limited growth in Georgetown. This would bring services across this Business Campus frontage and development at this corner would reduce overall cost sharing for any services required for expansion of residential areas.	See above response [A]
	4. Widening of Winston Churchill from 2 to 4 lanes from 5th Sdrd to Hwy #7 already planned for 2018. Designating lands for development will likely assist in acquisition of any required road widenings.	
	5. Our plan shows a diversion of Winston Churchill Blvd along the lake frontage which could both incorporate any future Norval By-pass as an extension of 10th Sideroad and eliminate the S curves near 10th Sideroad which will only become more dangerous with increased population and traffic.	
	6. The Norval Business Campus could become the start of a long term employment north-south corridor linking up with Steeles Avenue which will strengthen the urban separator between a largely built-out Brampton and the rural character of a much smaller Halton Hills.	
	7. In addition to the Employment lands designated along #401, Halton Hills needs sufficient lands in future to attract quality office space near the urban area so that residents have a short commute and higher paying, quality professional jobs.	
	We look forward to working with you and your staff in the consideration of these lands for Future Employment designation.	
	Supporting Documents:	With respect to Deal convicing
	 Figure: Proposed Noval Business Campus Figure: Wastewater Options Plan (Peel) Figure: Water Supply Option Plan (Peel) 	With respect to Peel servicing, through staff report PPW 30-08, Council was made aware that the Commissioner of Public Works and Engineering Services would initiate discussions with the Region of Peel to explore the potential for servicing growth areas from the Region of Peel's water and wastewater systems. These options will be included for consideration through the Sustainable Halton process
Public Comme Burlington	September 5, 2008:	
Resident #1	Just to set the following agenda. I am totally against regional	
September 5,	government. I have been from the beginning. it strikes me that	Providing infrastructure is a

Source	SUBMISSION	Response
2008	the Regional concept is simply a shell game to pick the pockets of local taxpayers. Why should I pay for the infrastructure needs of Milton etc? However I will agree that the concept itself is a politicians dream. Most of the functions run by Halton would be better served by the local municipality. At least, expenditures would have closer scrutiny and be closer to the taxpayer. In the interim I have some questions How dumb are local taxpayers that they must be reminded to	significant function of the Region and ensures that servicing is reviewed across the Region as a whole. There are reminders published in local newspapers for a variety of
	take out their garbage, 3 or 4 times a week in the local newspaper? Who is paying for the ads?	reasons (i.e. special schedules) as the reduction of waste and recycling is an important Regional responsibility.
	Why is the Region in the education business [see seminars for small business? I thought Education was a Provincial responsibility?	The Region does offer one-window access to government programs and services, information on Halton's business environment, and services to help people establish, expand or consolidate a business within Halton's borders.
	Than there is changes to Tremaine road, six lanes for highway 5, just how do these changes affect local taxpayers now. If such changes are required over the next 25 years let future taxpayers pony up. We all know the costs for these projects will double/triple over those years because of changes. It strikes me that the Region has access to far too much cash and is looking for ways to spend .Sustainable Halton is a crock.	Development charges pay for most of these infrastructure improvements.
	However, Halton politicians will claim their hands are tied by the Provinces "Freedom from democracy Plan. If the various Regions stood up to provincial planners, they would have to find other alternatives to the planned creation of rats mazes all over the Golden Horseshoe. September 8, 2008:	Provincial legislation requires the Region to conform to Places to Grow, the Provincial Growth Plan for the Greater Golden Horseshoe.
	I would like to open by thanking Ms. Fulford for her politeness and assistance at the Burlington meeting. While I understand that you and your team are planners not politicians, I must vet my frustrations on you When regional govt was introduced, it was ballyhooed as an extension of democracy. I find this Sustainable Halton exercise a complete waste of time and taxpayer money and a total abrogation of free speech and democratic control.	The Region must plan for the forecasted growth so that the Region can prepare financially, provide the necessary infrastructure, and ensure complete community development to meet the needs of Halton residents.
	Monies are being designated for infrastructure projects that are not required by the present taxpayer base and will have to be changed {read more money} over the planned 30 years in redevelopment charges. The Province is calling the tune and the Region is going along for the ride. Where is the leadership, democratic process in all of this? If	The development charges by-law is updated regularly to ensure that growth–related costs associated with the capital infrastructure needed to service new developments are recovered from the development

Source	SUBMISSION	Response
	the province is with holding money for this charade than I suggest that the region withholds any development until they do. I apologize for my rant, but you asked fir my input.	community. Financial investment will be needed from the Province to ensure the delivery of provincial and other services.
	September 10, 2008: I understand your position re the sustainable project since your roles are strictly implemental. Your inputs to this particular project may be valid or not. Since your people cannot validate the purpose or validity of projects like this, my input on the quality of the plan {or that of any taxpayer} is redundant since they had little or no involvement with the provincial plan .Hence the political process has trumped the democratic process. thanks	While the Region is required to implement the policies of the Provincial Growth Plan, Sustainable Halton is still very much a Halton specific exercise. We need to plan for growth in the context of this Region and its unique needs. Therefore, we want the public to be involved as Regional Council seeks the public's input in their decisionmaking.
Campbellville Resident #1 September 24, 2008	Att: Sustainable Halton Growth Management Team Re: Public Input Regarding Growth Options I am a resident and property owner in the Village of Campbellville. I also am a partner in a land development company. I attended two of the Region's public open houses at which five Growth Concepts were presented for our review and comment. I understand that the purpose of the meeting was to obtain the opinion of residents and stakeholders in an attempt to provide for a stronger community by providing direction in the Official Plan to determine in advance how and where a great number of people and jobs will be accommodated in our community by the year 2031. In principle I agree with the overall rationale of designated 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. My chief concern related to Sustainable Halton however, is the	Comments noted. The Sustainable Halton process is
	My chief concern related to Sustainable Halton however, is the lack of consideration for our existing Hamlets in Halton Region including my community of Campbellville. The Growth Concepts presented to date do not appear to offer any consideration for modest and reasonable growth in Campbellville or other hamlets, which would secure their	The Sustainable Halton process is the Region's growth management initiative to achieve conformity with the Provincial Growth Plan. Through Sustainable Halton, future urban growth areas will be identified. The

Source	Submission	Response
	future sustainability and advance them toward the concept of a complete community. It is imperative that Sustainable Halton make policy consideration to protect the needs of the hamlets thereby taking a more balanced approach to growth. The community of Campbellville for example, is more than simply a cluster of homes. It is also a community that provides local commerce and amenities to its residents and has done so throughout its long-standing history. Campbellville and its business community would benefit greatly from modest growth and Sustainable Halton presently fails to address this. In a land development era of large scale and "big box" styled growth, it is small business owners and communities such as Campbellville that become victims of this trend. Businesses need the support of population to be sustainable or we risk seeing our village decay as residents of Campbellville are forced to travel to Milton for our daily needs. Our community needs to grow in order to remain sustainable or we will truly decay into the definition of sprawl that the Region is fighting to contain within core areas.	Hamlet of Campbellville is not located within the Sustainable Halton Primary Study Area (the area within which new urban areas will be designated to accommodate future growth between 2021 and 2031) and as such, is not being considered for future growth through the Sustainable Halton process. However, there may be opportunities outside of the Sustainable Halton process to pursue hamlet expansion, subject to applicable planning policies. Any request for hamlet boundary expansion would have to be dealt with in the context of the applicable planning framework (which depending on the location of the hamlet, could be subject to the policies of the Niagara Escarpment Plan, the Greenbelt Plan, the Regional Official Plan, and the applicable Local Official Plan).
	Strategically, I would suggest that it is wise for the Region to introduce policy that would enable some growth in other communities outside of the present study area. In doing so, if real growth outpaces expected growth there would be alternative development location available to deal with surplus demand.	There may be opportunities for hamlet boundary expansion through policies of the Regional Official Plan and applicable local official plans. For hamlets located within the Niagara Escarpment Plan, consultation with the Niagara Escarpment Commission regarding their hamlet expansion policies is recommended.
	As a land owner within Campbellville, I implore the Region to consider the future of this community in its growth plans. Through the Sustainable Halton initiative, I would ask that this hamlet be identified for some limited new growth. I make this request recognizing that this community should not be targeted for excessive development opportunities or expansion. Rather, the rationale behind this request is based on the desire to ensure that enough new growth is able to occur in an orderly and reasonable way to guarantee the long-term viability of the established community and its existing businesses.	Sustainable Halton is not the appropriate initiative within which to consider hamlet expansion. Halton Region and the Town of Milton are both undergoing an Official Plan Review process. In accordance with the hamlet policies of the Greenbelt Plan, you may wish to bring forward your request for consideration through the Region or Town's Official Plan Review process. A meeting with Regional and Town of Milton planning staff is recommended.
	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	Comments noted.

Source	SUBMISSION	Response
	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.	
	Campbellville requires 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 Regions' 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.	
	I own a parcel of land immediately adjacent to the present western urban boundary of Campbellville. This property is located between existing residential homes adjacent to the east of it, and an employment park adjacent to my property's west boundary. My property abuts Reid Sideroad to the north, Twiss Road to the west, Campbellville Road to the south and the urban boundary to the east. My property is an unremediated gravel extraction pit and is agriculturally fallow. My property is located outside of the Niagara Escarpment Protection Area and would benefit greatly from remediation (as is required by the Provincial Policy Statement). Remediation will be achieved with meaningful residential development and cannot realistically be achieved otherwise. As my land is located adjacent to the urban boundary of Campbellville, the rationale to permit development on this property is comparable to the rationale for developing the properties identified by the five Growth Concepts due to their immediate proximity to Georgetown or Milton: "to avoid conflict with agricultural, extractive industrial and natural environmental areas" by controlling urban sprawl. As my property is an infill parcel with no agricultural, aggregate or environmental value, policies allowing the potential for redevelopment is sensible. The only difference is that sustainable core development is predicated on the availability of full municipal services whereas the entire	
	Hamlet is on private services. Sustainable development in our Hamlet communities depends on a balanced approach that considers modest growth on private services to support our existing village commercial core. The result of Sustainable Halton will be a growth management document that will be used to provide the basis for amendments to the current Official Plan, and to help formulate	The Sustainable Halton process is the Region's initiative to achieve conformity with the Provincial Growth

Source	SUBMISSION	Response
	policies for future versions of Halton Region's Official Plan. It is critical in my view that this process considers the growth needs of hamlets within our Region. Policies enabling a amount of growth in hamlets including Campbellville will not compromise the present growth concepts of Sustainable Halton. Acknowledging through the Sustainable Halton process that limited growth within Campbellville and similar hamlets would be appropriate to ensure future viability, is perhaps all that is required. This acknowledgement could then provide the basis for the Town to consider a rounding out of the Campbellville settlement boundary to include infill properties such as mine when the Regional and local Official Plan are amended this coming spring to comply with Provincial Plans.	Plan. The Regional Official Plan will be updated to incorporate the policies of the Growth Plan. The Region's Official Plan Review process, now underway, will incorporate changes in order to conform to new Provincial legislation, and also to incorporate other policy directions as identified.
	I understand that the process of rounding my property into the hamlet is possible when the Official Plans are brought into conformance with the Provincial Plans this coming spring. I am advised that the Greenbelt Plan enables this rounding exercise to occur through a one time only window at the time of municipal conformity as outlined in policy 3.4.3.2. Our Hamlet of Campbellville deserves an opportunity to sustain itself in the coming years. In order to do so, some growth in the Hamlet is needed to that is can remain relevant, and local businesses can continue to be viable amidst intense development throughout other parts of the Region. With Sustainable Halton and the upcoming amendments to the Official Plans in the spring, the Region can protect Campbellville by introducing policy that will provide and opportunity to include infill properties such as my land in the settlement boundary for growth. This policy if applied will benefit Hamlets by providing the basis to round out settlement boundaries during the one time exercise that is to occur in conjunction with this process. Our Hamlets deserve and opportunity to remain vibrant and relevant by providing for growth if justified because they are sufficiently remote from the urban core and essentially self sufficient. At this time I would ask that the Region of Halton take into consideration the future of Campbellville (and other Hamlets in Halton Region) by introducing policy enabling Councils to consider the rounding of hamlet settlement boundaries if required to secure the future of these proud communities. I am aware that both the Town of Milton and the Town of Halton hills have provided individual submission to Sustainable Halton expressing various concerns with the proposed growth options and the supporting policy framework. As such I have provided a copy of my letter to each of those municipalities so that they are aware of my concerns and my recommendation to improve the Growth Management	Policy 3.4.3.2 of the Greenbelt Plan states "Outside of specialty crop areas, minor rounding out of Hamlet boundaries at the time of municipal conformity is also permitted in keeping with the character of the Hamlet. This rounding out is only permitted subject to the infrastructure policies contained in section 4.2 of this Plan and municipal official plans". For hamlets located within the Greenbelt Plan, a request for hamlet boundary expansion would be addressed through the official plan review process, when an official plan is being brought into conformity with the policies of the Greenbelt Plan. Halton Region has initiated an Official Plan Review process to bring the Regional Official Plans, including the Greenbelt Plan. The Town of Milton is also undergoing a review of their Official Plan. You may wish to bring forward your request for consideration through the Region or Town's Official Plan Review process. A meeting with Regional and Town of Milton planning staff is recommended.

Source	SUBMISSION	Response
	In closing, I would be pleased to meet with representatives of Sustainable Halton separately or collectively with other interested stakeholders to further discuss all issues of concern related to the present Growth Concepts. I look forward to hearing from you to discuss my concerns and participating further toward working out a strategy that will be a benefit to all.	
Campbellville Resident #1	Att: Sustainable Halton Growth Management Team Re: Public Input Regarding Growth Options	
September 26, 2008	I am a resident of Campbellville, a landowner in the Town of Halton Hills and a land developer. I attended two of the Region's public open houses at which five Growth Concepts were presented for public review and comment. I understand that the purpose of the meeting is to obtain the input of residents and stakeholder prior to finalizing the five Growth Concepts. I understand that our input may assist our staff and politicians in a decision making process that may result in a decision to choose on of the presented concepts, a modified version or even a new concept that considers aspect out of each of the five proposals. I am concerned my input is well received as this process will result in the preparation of development policies in our Official Plan documents that will shape how and where a great number of people and jobs will be accommodated in our Region by the year 2031. Upon review of the Growth Concepts, I believe that a balanced approach to growth holds the most merit. In that regard, both Milton and Georgetown should receive the majority of the mixed land use growth expected for the Region, and employment uses should be focused around the Highway 401	Please refer to the previous submission dated September 24,
	corridor. I also believe that opportunities should exist for moderate growth to occur in some of the hamlets throughout the Region to ensure they can look toward the prospect of remaining vibrant sustainable communities in the future.	2008 for a response to hamlet expansion.
	In regard to employment lands, I feel as though Sustainable Halton is correct in allocating the majority of these uses along the Highway 401 corridor. My concern in relation to the Growth Concepts however, is that if a balanced approach to residential development takes place (which I agree with) then the Region must also ensure that the Town of Halton Hills receives its fair share of employment lands. The present Growth Concepts in my view do not contain adequate provision for this, and I believe that a reallocation or even more employment lands must be allocated to the Town of Halton Hills.	Achieving an activity rate for each of the Local Municipalities that reflects balanced, sustainable communities was a key consideration when refining the Growth Concepts (the activity rate is the number of jobs compared to the total population, expressed as a percentage).
	I am concerned that some of the concepts try to shoe horn industrial land in a ribbon between 4th Line and 3rd Line whereas the priority development area is more obviously along Highway 25. The Highway 25 corridor should be priority employment lands because the amenities are already there.	Hemson Consulting Ltd has completed an updated land supply analysis. Based on additional detailed analysis including the 2006 Census data, as well as further

Source	SUBMISSION	Response
	amendments to follow. If this opportunity is taken now, the Region and its municipalities will not find itself in a situation that many municipalities have in which non-employment uses dominate development, and municipalities struggle to uphold a sustainable ration of land uses.	
	For these reasons I strongly support the Sustainable Halton growth team to secure more employment lands in Halton Hills, and especially to utilize the strong locational aspects of the Highway 25/Mansewood area to help achieve this. I would be pleased to meet with representatives of Sustainable Halton separately or collectively with other interested stakeholders to further discuss all issues of concern related to the present Growth Concepts. I look forward to hearing from you to discuss my concern and participating further toward working out a strategy that will be a benefit to all.	
Cynthia Clark for Campbellville Resident #2 September 30, 2008	I represent a resident of Campbellville. I have reviewed your proposals on behalf of my client and as part of the Sustainable Halton process. I would like to inform you of my thoughts on the proposals as presented. I noticed that none of the study area referenced the hamlet of Campbellville. No doubt you must be aware of the challenges currently faced by the commercial proprietors there. Many have marginal sales and there seems to be a high turnover of businesses. This is quite frustrating to the residents, as any sustainable community requires a balance between employment and residential. Obviously this is not currently the case.	Since the Hamlet of Campbellville is located within the Greenbelt Plan Area, the Province would not support its inclusion in the Primary Study Area (the area within which new urban areas will be designated to accommodate future growth between 2021 and 2031).
	On behalf of my client I would urge the Region and Town to consider as part of this process, the expansion of the Hamlet of Campbellville with respect to an increase in lands used for residential purposes. It is also my understanding that Campbellville is not alone in this situation but other Hamlets have similar circumstances.	Any request for hamlet boundary expansion would have to be dealt with in the context of the applicable planning framework (including the Niagara Escarpment Plan, the Greenbelt Plan, the Regional Official Plan, and the Town of Milton Official Plan).
	My second observation is that there does not appear to be enough land proposed for employment purposes within the study area, in any of the schemes presented. If one just looks at the low occupancy warehouse type uses currently in operation along the 401 corridor, the proposed capacity of lands would be greatly reduced from what it is forecasted to accommodate. I would highly recommend that the amount of land designated for employment use be increased. There is a pocket of land in the Mansewood area that would be a suitable area for this and to my understanding is of little agricultural value.	Hemson Consulting Ltd has completed an updated land supply analysis. Based on additional information (which included previously unavailable 2006 Census data), as well as further analysis of the type of employment development occurring in Halton, the employment land needs has been increased to a total of 1,100 hectares. The detailed land supply analysis can be found in <i>Report 3.07: Sustainable Halton: Accommodating Growth to 2031.</i>

Source	SUBMISSION	Response
		The proposed locations for employment are along the Highway 401 corridor, north of Highway 401 along the future James Snow Parkway, along Highway 407 in east Milton, and along Tremaine Road around the CN rail line. Please refer to the report, Sustainable Halton: Concepts for Addressing Halton's Land Needs to 2031, (Report 3.08) prepared by Urban Strategies Inc.
Georgetown Resident #1 September 14, 2008	Having lived in Esquesing, Georgetown, and Halton Hills, in Halton County, for the last 47 years with my quality of life deteriorating for at least the last 20 we feel compelled to comment on the places to grow plans. To be ordered to accept 20,000 to 60,000 and ultimately 110,000 people into the communities of Milton and Halton Hills is absolutely ludicrous. The local roads and main arteries are at capacity now, how can we possibly entertain the thought of	Comments noted. The Region is preparing a Transportation Master Plan to the
	putting another 20,000 to 40,000 more vehicles on these routes? Even if you could guarantee half of this increase would use public transit, it is still unworkable with the current infrastructure. In Halton Hills, we are considering taking some of the best	year 2031 to plan for the projected population growth. It includes aggressive targets for transit use. Sustainable Halton is planning for more compact communities to support a more extensive public transit network.
	farmland in the county out of production for the sake of growth. How terribly stupid of us! Is there any possibility of curtailing this unbridled growth, and greed?	Halton Region has developed an agricultural strategy that builds on the policies of the Official Plan by providing support for agricultural sustainability in the Region through tools and initiatives to support the agricultural community.
	We must stop importing people to this country, or at very least to this area, and grow at a slower and more controlled pace.	The Province requires the Region to plan for the population and employment forecasts contained within the Provincial Growth Plan for the Greater Golden Horseshoe. The long term growth and distribution of population within the Province and the Country is an important issue that warrants further attention from all levels of government.
	We must increase the capacity of the roads and infrastructure BEFORE we consider any increase to our current population.	
	We do believe our local mayor and councilors are doing their	

Source	SUBMISSION	Response
	very best to work within this imposed framework and we would look forward to a reply from all, but particularly the MP's about this immigration free for all, with our current employment problems, and the MPP's as to why all this growth must take place in Halton or indeed the Golden horseshoe at all.	
Georgetown Resident #2 September 23, 2008	I am writing to let you know that I fully support Concept 1 – Milton Centred Plan - which emphasizes development of the 401 corridor in the Town of Halton Hills and the Town of Milton. This plan will preserve some of the best farmland in the country, will reduce urban sprawl and limit the amount of pollution and smog in the air. I moved to Halton Hills because I wanted to live and raise my family in a small town (Georgetown). I don't want Halton Region to have the urban sprawl of Mississauga and	Comments noted. The Regional Official Plan contains policies that promote the protection of agricultural land and the construction
	Brampton. If we pave over all the good farmland in the country, how will we support ourselves in a sustainable manner in the future? Let's make a responsible choice of focusing high density growth in the areas close to the 401 to help reduce our social and environmental footprint on this Earth.	of compact communities. Through the Official Plan Review, these policies will be strengthened as per the policies of the Provincial <i>Places</i> to <i>Grow Plan</i> and the <i>Greenbelt Plan</i> .
Georgetown Resident #3	I wish to comment briefly on the Sustainable Halton Plan in the context of growth in Halton Hills.	
September 23, 2008	I am unclear why all the options for residential growth in Halton Hills are associated with the same, fixed amount of commercial/industrial growth (11,000 jobs on 340 ha). The Town of Halton Hills is currently deficient in terms of industrial base (relative to current residential base) and will need this type of growth before any additional residential development is approved. Thereafter, residential growth should be permitted only at a rate commensurate with industrial growth. No plan should be approved that would allow for residential growth to continue to outpace commercial development.	Achieving an activity rate (the ratio of jobs to residents) for each of the Local Municipalities that reflects balanced, complete and sustainable communities was a key consideration when refining the Growth Concepts. Local Municipalities were active participants in this exercise.
	Furthermore, the plan does not appear to consider recreational infrastructure needs within Halton Hills. Having school-age children involved in various extracurricular activities, it has become obvious that Halton Hills is under serviced with respect to recreational facilities. For example, hockey families are having to travel to neighbouring towns (Hillsburgh, Milton) to obtain practise ice time, the GDHS indoor pool deck and lobby areas are inadequately sized and configured for hosting swim meets and neither does the shallow depth of the Gellert pool allow for hosting swim meets, there are no 3-m springboard or platform diving facilities in Halton Hills, and baseball/softball and soccer teams appear to be competing for limited field space. At a time when everyone recognizes that youth should be encouraged to be more physically active, we cannot have such limitations to access of facilities and programs.	The Provincial Places to Grow Plan requires that a Community Infrastructure Plan be completed to deal with the issue you raise, among others. The Region will begin developing the Community Infrastructure Plan once a preferred land use option is selected by Council and will work closely with other Regional Departments, the Local Municipalities and other service providers to ensure a plan is developed that adequately addresses community needs.

Source	SUBMISSION	Response
	Consistent with the above, I would not be in favour of any further residential growth in Halton Hills until commercial development and recreational infrastructure catch up with the existing residential base. If this can be done and future growth is unavoidable, Option 2B seems most sensible in terms of the ultimate residential/commercial balance and keeping the community geographically centred near its current position. I fear that the other growth options which involve development of lands further to the south will shift consumer pressure to the south of town at the expense of the downtown core and businesses along the north end of Guelph Street.	
Georgetown Resident #4 September 30, 2008	It is a sad fact that Halton Region has so far squandered the opportunity to develop an Overarching Sustainability Plan as has been done in places like the Region of Halifax and Vancouver. Many continue to hope that this type of framework will still be adopted into the planning regime to bring us into the 21st Century.	The Region is presently developing a Corporate Sustainability Plan which focuses on the functions and decisions made within the organization
	The Five Growth Options are premature. Decisions are being made in the absence of critical data.	
	TOPICS OF CONCERN:	
	1) POPULATION NUMBERS Other municipalities such as Guelph and Caledon have questioned the numbers being sent their way. Just as Halton Region questions the financing of growth through their Fairness Campaign, we should continue to be on record as questioning the population numbers based on the Environmental Commissioner's Annual Report. The Environmental Commissioner produced a report that speaks to this issue. Gord Miller, in his Fall 2007 report page 18 states:	Through Report No. PPW15-06, the Region committed to meeting the population and employment targets mandated by the Province through <i>Places to Grow.</i>
	"Our analysis shows that <u>sustainability must become the key overriding principle</u> in guiding efforts to accommodate the human population increases projected for Southern Ontario." (Underlining added.)	
	And further on page 20 the report speaks about carrying capacity: "Failure to consider basic questions of "Where to grow?" and 'How much to grow?" is the fundamental problem with many provincial planning initiatives in Southern Ontario. Provincial planning efforts do not employ an ecosystem sustainability perspective to evaluate which communities have the carrying capacity available to accommodate population increases" (Underlining added.) A carrying capacity study would give Halton Region the data to question the population numbers. Are we trying to put 300 people in the boat, only to discover that the boat has a capacity of 100?	

Source	SUBMISSION	Response
	2) UNREALISTIC DEADLINE: The artificial deadline from the province of June 2009 is leading to bad planning. OPTIONS ARE BEING DEVELOPED WHEN INFORMATION FROM IMPORTANT STUDIES IS NOT AVAILABLE. i.e. (Carrying capacity, Intensification (from the Town of Halton Hills), Land Evaluation and Area Review (LEAR) to assist in delineating Halton's prime agricultural area.) Why pay for studies and ignore the data?	A series of Technical Reports have been prepared to inform the selection of a preferred growth concept and to provide direction for policy development. Included are reports on natural resources (Sustainable Halton Natural Heritage System Definition and Implementation (Report 3.02) prepared by North-South Environmental, Report 3.04: Agricultural Countryside Strategy), prepared by Planscape, and the Aggregate Strategy (Report 3.05) prepared by Meridian Planning), urban land needs, and sustainable communities, among others. These studies were used to inform the Sustainable Halton process.
	TO ADDRESS THE DEADLINE: I was told some time ago by Ho Wong, that the June 2009 deadline could be pushed out 6 months. Recommendation: Push out the deadline so that we can benefit from the studies needed.	Through staff report LPS26-08, the Region advised the Province that a six month extension would be required to complete the conformity exercise.
	TO ADDRESS THE IMPACTS ON AIR QUALITY, ETC: In February 2007 Dr. Nosal, our Regional Medical Officer of Health, put forward a document on Air Quality in Halton. The costs to human health are huge, as are the dollar figures to deal with the health effects	Air Quality is addressed through the report, <i>Connecting Sustainability in Halton RegionFrom Policy to Practise.</i>
	Apparently, Oakville Council passed a motion requesting:	
	"THAT a cumulative environmental analysis, a cumulative air quality impact analysis and a traffic congestion impact analysis of the Refined Options be completed by the Region before any decision is made by Regional Council on the Refined Options."	
	This is a prudent approach and only reasonable considering that we are planning out to 2031. Let's get it right!	
	3) AGRICULTURAL LAND: Agricultural land must be saved. I am sure that if we were to do a carrying capacity study that we would not have enough land to feed this expanded population. With the cost of fuel rising it will not be economic, much less a wise thing to be transporting our food from a great distance with climate change a major issue.	Carrying capacity is addressed through the report, <i>Connecting Sustainability in Halton RegionFrom Policy to Practise.</i>
	This also does not begin to address feeding the population of Toronto.	

Source	SUBMISSION	Response
	Greenhouses heated by geothermal energy and other innovations would allow us to grow right though the winter. MAKE HALTON HILLS A MODEL OF WATER EFFICIENCY: Once the outstanding data gaps have been dealt with, the option for Halton Hills should use water as a defining constraint. Practice intensive water conservation and allow only the development that can be accommodated by groundwater.	Lake-based and groundwater servicing options are currently being explored for the future population in Halton Hills.
	Some principles: • The Intensification Target for urban is a minimum of	Regional staff have considered the
	 40%. We should aim to exceed that. Second and third storeys can be added to one storey stores and restaurants. Intensification must come before greenfields development. How do we know how much land to add to the urban boundary when we haven't explored intensification FIRST. Employment lands must be developed first. Public transit must be in place before new housing is on the market. Four storey condos and/or apartments should be given priority. 	comments contained within the submission as part of the Sustainable Halton process. Intensification was a factor in determining the amount of greenfield lands required to meet the <i>Places to Grow</i> forecasts.
Georgetown Resident #5 October 2, 2008	As a resident of Georgetown, and a small business owner here, I'd like to put in my "vote" for Option 2B. I prefer this option because: - it allows a reasonable level of growth that will permit the community to develop without becoming overwhelmed - it focuses the growth closer to the downtown core of Georgetown. I'm concerned that if we proceed with Option 2A it will	The comments on the Growth Concepts have been duly noted by Regional staff. The evaluation process, employing the evaluation framework, is being used to evaluate the relative merits of proposed locations for new urban lands.
	see residents of Georgetown driving south to Milton and Mississauga for services and entertainment. By keeping the development in the north it will encourage and sustain small businesses in Georgetown and Acton and help to maintain the character of our community.	
	I would also like to comment that I'm concerned that none of the options offer more employment lands in Georgetown and Acton. While I'm supportive of our Industrial Corridor along the 401, the more that we can have people working in the communities in which we live, the better quality of life we will all share. I don't believe that the four themes endorsed by Council through PPW15-06 in particular "Foster Complete and Healthy Communities" can be respected	In order to create more balanced, complete communities, the new mixed-use/residential areas will be planned to accommodate not only residential but also services, employment uses and community facilities. Anticipated employment within the mixed-use/residential

Source	SUBMISSION	Response
	without actively encouraging employment close to home. I have copied my Town Councillors on this email. Thank you for considering my views in this matter.	areas includes office, professional, retail, work-at-home and public service uses (schools, hospitals, recreation centres and social services).
Halton Hills Resident #1 September 13, 2008	I'm very concern about this matter, we should get together and fight developers and politician from overgrowth (Halton Hills). Building so many townhouses in Georgetown (Halton Hills) created depressed housing prices. Builders only care is money. Please stop the overgrowth if this isn't stop now I can see my future living in a congested city with a lot of traffic Jams. Where are the nice single houses? Most constructions are tiny townhouses. THAT IS ANOTHER REASON OF EXCESSIVE GROWTH.	Meeting the Places to Grow Plan requires a shift from single detached housing towards more compact ground related forms such as semidetached and row houses. The housing mix for Sustainable Halton is 80% ground related and 20% apartments, which continues to support Halton as a preferred location for families. The Region is committed to achieving more compact development, which will have a number of benefits (such as better use of infrastructure, a more walkable community and more housing choice) that will move us towards a more sustainable community.
Milton Resident #1 September 8, 2008	As a 22-year resident and taxpayer of Milton, it pained me to read the verbal diarrhea that emanated from the lips of our illustrious Town of Milton CAO, Mario Belvedere, at a recent town council meeting. He stated that the Town is doing an "outstanding" job and that growth has been managed well overall. Not surprisingly, the statement was supported by his minions in the planning and engineering departments, who make me, ask outstanding compared to what? The term outstanding is used to describe things that are exceptional, terrific, wonderful, stupendous, dazzling, marvellous, excellent, great or superior, not abysmal, myopic, unresolved, unsettled or incomplete. Attempts to downplay the glaringly-visible deficiencies that plague Milton & Halton are disappointing to say the least, as statements suggesting there might be "hiccups" when it comes to things like the timing of road construction can only lead one to believe there have been and will continue to be numerous glitches, interruptions and setbacks. In my opinion, this has been characteristic of the progress of the roadwork and other infrastructure-related projects to date in Milton. Now one may ask how the City of Mississauga was able to implement access roadways into and out of subdivisions equipped with proper turn lanes, fully-functioning street lights and pedestrian crossing systems prior to new subdivisions being completed? Might it have something to do with the fact	Regional staff have considered the comments contained in the submission as part of the Sustainable Halton process. The evaluation process, employing the Evaluation Framework, is being used to evaluate the relative merits of proposed locations for new urban lands. Transportation and Water and Wastewater Master Plans will be revised after a preferred growth option is selected by Council to plan for infrastructure requirements of future growth to 2031.

Source	SUBMISSION	Response
	that the City of Mississauga actually controlled the manner and pace in which growth was implemented? This logic seems to have evaded the grasp of the current director of engineering services, whose portfolio includes both transportation and community services plans for recreational facilities such as arenas. In terms of roadways, commuters traveling east on Derry Road are now treated to a traffic backlog stretching all the way from Trafalgar Road down to Trudeau Drive. Sixth Line south of Britannia Road is another source of commuter frustration, as drivers are greeted with an absence of turn lanes and traffic lights. Town Engineering Services Director Paul Cripps' reply to this is that "staff is mindful of the needs in rural Milton." Okay, prove it. BRITANNIA ROAD IS NOT PLANNED FOR TWINNING UNTIL 2015!!!!! Meanwhile, Milton District Hospital is a mess that speaks to the collective inaction by the four levels of government within our area to ensure it's able to adequately service the healthcare needs of Miltonians. It's abundantly clear that it isn't. I'm thankful my children were born between 1988 and 1992 when the hospital was able to adequately manage the patient load, and the emergency room was treating emergencies. What has the Town of Milton's executive and administration done in conjunction with the Region of Halton, provincial and federal levels of government to ensure the provincial minister of health, premier of Ontario and federal minister of health are aware of our hospital's needs? And what has the Town done to secure the requisite funding to resolve the hospital's need for expansion?	The widening of Britannia Road from 2 to 4-lanes 'start of construction' is currently programmed for 2013 as part of the Region's Roads Capital Projects (2009-2018). Regional Chair Gary Carr has been involved in discussions with the Province regarding funding arrangements for health care facilities.
Oakville Resident #1 September 12, 2008	TO: Director of Planning & Engineering Services SUBJECT: Sustainable Halton: Public Information meeting – 10 Sept. 2008, Oakville I attended the above meeting, as a resident of Oakville, and am pleased to accept your invitation to submit my comments. I would be obliged if you would see that my submission is distributed to the appropriate staff. I submit these comments simply as a resident of Oakville, and not on behalf of any residents' or other special-interest group; further, I own no interests in developable land in the study area. Meeting logistics 1. I was exceptionally disappointed by the total lack of any Regional Councillors from Oakville at this meeting; they didn't even bother to send regrets via the facilitator – all it would take is an E-mail or a phone call on those expensive Blackberries they all play with – by just one of them – or by their retinue of staff. One's immediate assumption is that they have already made up their minds, so that the public's input is really a consummate waste of time. 2. I was certainly impressed, as were others in the	The comments on meeting logistics have been duly noted by Regional staff.

Source	SUBMISSION	Response
	 audience, that Gary Carr took the time to attend. The facilities were appropriate for the meeting and very convenient; given the dinner hour conflict, the free coffee was appreciated. The displays and workshop materials you provided were well-prepared, informative, easy to use and to understand – as far as they went (see below) Your facilitator, Glen Pothier, is a consummate professional Your consultant (USI) was ill-informed and not easy to work with: one had the distinct impression they were just there to "sell the plan", come what may – "just choose one of the options and then we can all go home". Attendance was pathetic (~ 30), and even worse (~ 10) for the consultation portion of the meeting. I respectfully suggest that 6:15 pm is an inappropriate start for a meeting in a commuting community. 33% of the "public" at out table were landowner/developers: I trust this fact will be noted in your final report, when you refer to "public consultation". (I noted an even higher proportion of developers and professional planners at the Sustainable Halton meeting I attended in Milton last winter). 	
	 The Sustainable Halton Plan My option choice is #2B. I provide this opinion "without prejudice", in line with the facilitator's statement that we were commenting on the basis of "if we are going to/have to grow", not "when we grow". Put another way: please do not construe my opinion as condoning the amount of growth you propose. It was my impression that your PowerPoint presentation gave the population growth as 53,000 persons between 2021 and 2031, and I asked at the meeting why the population growth would slow down to this extent. None of your staff or consultants at the meeting could explain what I suggested was a weird aberration in your planning numbers, which are the basis for the whole Sustainable Halton plan. I was only to learn later from Alana Fulford that I had mistakenly understood 53,000 persons for what actually read 53,000 [housing] units in the PowerPoint presentation. 	The evaluation process, employing the Evaluation Framework, is being used to evaluate the relative merits of proposed locations for new urban growth. The public will be consulted on the Sustainable Halton Phase 3 reports, including the <i>Summary of Evaluation of Growth Concepts, (Report 3.09)</i> all designed to guide Council's decision in adopting a preferred land use plan for the planning horizon of 2031. Public consultation will take place in April and May of 2009.
	 3. So population growth actually jumps ~ 20% in 2021, while employment numbers drop 33% in the same period. It would be helpful and appreciated if you could provide the demographic logic that supports these changes in population and employment. 4. Andrea tried to tell us that development is completely prohibited in the Greenbelt areas of Halton. When I politely pointed out that the Greenbelt legislation actually does permit certain infrastructure and other alterations to take place in the Greenbelt area, she 	An updated land supply analysis can be found in Hemson Consulting's report, Sustainable Halton: Accommodating Growth to 2031(Report 3.07). Please refer to this report for further details on population and employment distribution to 2031.

insisted that I was mistaken – until one of your staff quietly suggested that indeed infrastructure is permitted. Subsequent to the meeting, I went on the Greenbelt website to remind myself, and found that not only are major infrastructure installations permitted, but also "major recreational uses" and aggregate (quarry) developments. Subsequent to the meeting, Alana Fulford kindly confirmed that electrical generating stations are also permitted within the Greenbelt. So let's be fair with the public and give them honest information, please. 5. Likewise Warren tried to tell us that the southwest corner of Milton would be maintained as a secondary agriculture belt! The area he was indicating already includes the Rattlesnake Golf Course, the Regional landfill, and will shortly include one of the largest Intermodal operations known to CNR or man! Why try to	
hide this from the public? You may be able to plant a few potato patches around the edges of the golf course and the landfill, but as soon as the Intermodal arrives with all its concomitant warehouse operations and enormously increased traffic patterns, any kind of practical farming will be totally impossible. 6. No one explained what "mixed use residential" neighbourhoods consist of. I happen to know because I attended all of the North Oakville planning meetings, but it's not fair to ask the general public where to locate a "mixed use" neighbourhood if they don't know what it is or what it looks like. 7. Andrea —— told us that the Region has commissioned and received no less that 22 background studies. I asked what key constraints or "stoppers" these reports might have identified for the Sustainable Halton Plan. Andrea's reply was "none". If that is true then it's my respectful opinion that the reports aren't worth the paper they're written on. I have to believe that these reports must have identified at least some negatives, and some constraints. Why not share those honestly and transparently with the public, and tell us how you plan to manage them? 8. Andrea told us that a study of the geology and soil types of Halton is "in the works". How sensible is it to start deciding on land use before you know the relative values of the land you're planning to use?? Shades of HUSP, the Trafalgar Moraine, and OPA 198!!! Shouldn't the Region be learning from its past mistakes?? Halton Region has completed it evaluation. The results of the study inform the evelopment of the latest Grov Concepts and was a critical pie the development of Halton's Agricultural Strategy (Container report, Agricultural Countyside Strategy (Report 3.04), by Planscape).	a helped initial elso any of s which ont. a Land LEAR) port on). Hed the wth ecce in ed in the

Source	SUBMISSION	Response
	and lacks any semblance of realism, for example: a) You want to build jobs, but staff has just recommended – and Council bought – a plan to bonus warehouses with a 30% D.C. discount. How does that recommendation support your need for increased employment density?? b) You have no plan as to how to provide water service and sewage services to north Halton Hills	The Water and Waster Master Plan to 2031 will address the provision of these services.
	c) You have no strategy of how you will manage biosolids disposal - for the whole Region	The Region continues to follow it's long standing strategy of maximizing the reuse of this valuable nutrient source, through a comprehensive agricultural land application program. Changing conditions have prompted the Region to modify the strategy over the past few years to include the option of producing both liquid and dewatered biosolids for land application. In addition, the Region has recently initiated a comprehensive review of long term biosolids management options to ensure that Halton's biosolids program will be sustainable and meet the current and future needs of the residents and businesses of Halton Region.
	 d) You document a need to keep Hamilton Harbour healthy, but you have not addressed the need to keep Lake Ontario healthy – that's where we return our wastewater, and get our drinking water. e) You provide no information on the transportation systems necessary to keep goods and people moving throughout the Region – we all know we've already got gridlock, so how will doubling the 	The Transportation Master Plan to 2031 will address the infrastructure needs to support the planned population.
	population improve that? f) You have made no provisions for the increased number of power generating stations that will be needed to service the Region. These need to be strategically and sympathetically located in relation to other land uses.	The Ontario Power Authority (OPA) is responsible for planning for future demand. The Region is working with the OPA in this regard.
	g) You talk blithely of "livable communities" but give us no information on where and how we will get the schools, the hospitals and other social infrastructure requirements to make them "livable".	Once a preferred Growth Concept is selected, the Region will begin developing a Community Infrastructure Plan to facilitate the planning and coordination of community infrastructure (such as schools, hospitals and other social infrastructure as you mention), to ensure that the needs of residents are met within the communities of Halton.

Source	SUBMISSION	Response
	Those are my comments, and I look forward to following the continuation of this process.	
Public Commenter #1 September 25, 2008	Thank you for the opportunity to provide comments on the five concepts presented for the Halton's Growth Management Plan, Sustainable Halton. My comments are focused on three areas: 1) developing a Sustainability Strategy, 2) growing our Greenbelt, and 3) incorporating results of important studies into the development of the final concept. All of these points are aimed at helping achieve Halton's Planning Vision as defined in its Official Plan. Introduction: Halton's Planning Vision	
	"to preserve for this and future generations a landscape that is rich, diverse, balanced and sustainable, and a society that is economically strong, equitable and caring" (Regional Official Plan).	These are vision statements upon which policies will be shaped (in the Official Plan) to attempt to implement that vision.
	 What does this Vision look like on a map? How does staff and Council define and delineate what a 'rich, diverse, balanced and sustainable' landscape looks like and will look like for future generations? How does a society look that is 'economically strong, equitable and caring?' 	
	In my opinion, looking to 2031 is not a long enough time horizon. We need to look 50 years, 100 years down the road. How do we envision Halton looking then? Is there an urban separator between Milton and Oakville? Is Georgetown a town or a city? Do we see farmland in Halton's future with a vibrant and strong agricultural community? Or has all the prime agricultural land been redesignated to be within the urban boundary, slated for development (or has it all disappeared in 50 or 100 years)?	Comments noted. As staff have undertaken the Sustainable Halton process, much of the decision-making involved with the various studies, strategies and plans as part of Sustainable Halton have required the consideration of even longer term impacts and scenarios. Staff agree that consideration of even the longer-term can be beneficial to the planning
	How do we want Halton's ultimate land use map to look? When all is said and done, will we have achieved and preserved a rich, diverse, balanced and sustainable landscape? Will we have established an economically strong, equitable, and caring society?	and decision-making process. Answers to the questions raised will depend on public input provided to Council before important land use decisions are made.
	In devising the current Growth Management Plan, Sustainable Halton, these are the questions staff and Council should be answering and acting upon proactively. To simply focus on a Growth Management Plan to 2031 without looking at the bigger picture defeats the purpose of this Vision statement.	
	This is my proposal: regardless of which of the five concepts or if a new concept is recommended for Halton's growth to 2031, the Region needs to take steps <i>now</i> to ensure that the Vision (as stated above) becomes reality. If we are to accept growth to 2031, what does the Region need to be doing <i>now</i> to ensure that we move closer to our Vision? Here are my	

Source	SUBMISSION	Response
	suggestions: 1) Develop a Sustainability Strategy for the Region. As is clear in the Places to Grow documents published by the province, this Regional undertaking, Sustainable Halton (SH), is a growth management plan. A sustainability strategy is so much more and different than what the Region is currently undertaking. As is clear in the following diagram taken from other SH documents and presentations, a sustainability strategy is identified here as one of the Region's endeavours but a true sustainability strategy is more all-encompassing and far-reaching than what is currently illustrated. A true sustainability strategy would be developed and then infused throughout the Region's activities and integrated into its policies and standard operating procedures. It is really a change in the way of doing business and a change in its decision-making protocols.	We agree. The Region will be developing an overarching sustainable approach to decision making. In this regard, staff will undertake a consultation process to define a "Sustainability Lens for Halton" that will address the values and commitments to sustainability in Halton Region and define the principles to achieve balanced decision making. Furthermore, the Region will develop a Corporate Sustainability Plan which will focus on the functions and decisions made within the organization.
	The Growth Management Stratogy is one of many Halton Region's Sustainability Initiatives Ingon's Sustainability Initiatives Ingon's Sustainability Initiatives Ingon's Sustainability Initiatives Ingon's	
	It would like something like this (see below) where the Sustainability Policy & Development Guidelines circle (located as a small circle in the above diagram) is transformed into the central circle (as seen below). All the other plans and strategies and programmes in the small circles are then developed and implemented using the sustainability framework established in the over-arching Sustainability Plan.	

Source	SUBMISSION	Response
	Region of Halton's Sustainability Plan Healt h Natu ral Region of Halton's Sustainability Plan Natu ral Communit Hous ing Natu ral Natu ral	
	I am pleased that the Region has hired a Senior Policy Analyst on Sustainability to coordinate the Region's sustainability efforts as a first step in this process. 2) Grow the Greenbelt Important findings and recommendations are presented in the Agricultural Countryside Vision background study (Planscape, May 2007). Even though the land in the Prime Study Area is virtually all Class 1 prime agricultural land, the five concepts propose growth in these areas. I assert that if we are to accept growth and lose <i>some</i> of Halton's prime agricultural land, steps should be taken <i>now</i> to preserve in perpetuity the strong agricultural community that currently exists in Halton below the Escarpment. By doing so, the Region will be a step closer to achieving its objective of <i>landform permanence</i> , " which has historically and will continue to be a fundamental responsibility and directive of Halton Regional Council" (PPW42-08, p.3). How can we do this? <i>Grow our greenbelt</i> . In the provincial document "Growing the Greenbelt" (August 2008), clear guidelines are outlined to apply to the Greenbelt Council in the Ministry of Municipal Affairs and Housing to increase the size of the Greenbelt. Once in the Greenbelt, these lands can never be removed, thereby preserving our agricultural landscape for future generations. If indeed a rich,	Planscape has prepared a paper entitled <i>Report 3.04: Agricultural Countryside Strategy,</i> that discusses how agricultural sustainability can be achieved. It is understood that land use policies alone cannot do this and that applying other tools with policies can be effective. The Region will not be pursuing Growing the Greenbelt at this time but the Region is pursuing other tools to achieve agricultural sustainability.

Source	SUBMISSION	Response
	landscape.1	
	Precedents for preserving agricultural lands have already been set in other parts of North America. For example, British Columbia has established the Agricultural Land Reserve, into which the urban settlement area cannot go. Portland, Oregon has an Urban Growth Boundary, inside which all urban growth is contained. Halton Region can draw upon these examples to help realize its Vision for the future.	
	3) Complete important studies Important studies were to be completed before a final concept is developed. These include the municipal Intensification Studies as well as the Regional Land Evaluation Area Review (LEAR) and the Carrying Capacity Study. The results of these studies are crucial in determining 1) how much growth can be accommodated through intensification, 2) how agricultural priorities and urban development requirements as defined in Places to Grow can be balanced, and 3) what the carrying capacity is for the Region and how that may affect how much growth Halton Region can sustain.	The Region has adopted a "bottom-up" approach with respect to achieving the intensification targets established in the Province's <i>Places to Grow Plan.</i> The Region has worked with the Local Municipalities to receive residential intensification units to 2031 and has ensured that these numbers were incorporated into the intensification work. The Land Evaluation Area Review study is contained as part of <i>Report 3.03: An Agricultural Evaluation,</i> which will be released to Council and the public for comment.
	To date, most of these studies have not been completed and need to be <i>before</i> a final growth concept is developed. The Planning and Public Works Committee should ensure that these studies have been completed and incorporated into Staff's next report and recommendation of a final concept.	A series of reports will be available for public review and comment prior to Council's selection of a preferred land use option. Carrying capacity is addressed through the report, Connecting Sustainability in Halton RegionFrom Policy to Practise.
	4) Five Concept Drawings Concerns regarding the five concepts presented in the last round of public information sessions: • I believe Halton Region should focus on intensification within current urban boundaries first rather than expanding its urban boundaries. Places to Grow (see 2.1, 2.2.2.1.a and b, and 2.2.3.6) and the Provincial Policy Statement (see 1.1.3.9.a and 2.3.1) can be interpreted as encouraging intensification first and as much as possible and expanding the urban boundary as a last resort. This is why getting the results of the municipal Intensification Studies and the Carrying Capacity Study is imperative before developing a final	We agree and have ensured that we achieve as much intensification as realistically possible through the Sustainable Halton process.

Source	SUBMISSION	Response
	 Does Halton's long-term vision include two separate and distinct towns of Milton and Oakville or will they eventually blend together into one metropolis? If the former, the purple-shaded area south of Milton (in all Concept drawings) will need to be modified to ensure that a sufficiently sized urban separator (other than just Hwy 407) is preserved as permanent greenlands. The land set aside in the Halton Waste Management Site should reflect the reality of the present and future land uses in that area, namely the landfill site as well as the probable establishment of a CN intermodal site. If the idea is to map what Halton Region will look like in 2031, the CN lands will probably be built by then and the maps need to reflect this. 	Regional staff have been advised of the importance of urban separators from members of the public. The refined Growth Concepts all have a distinct separation between the urban areas of Oakville and Milton. Through their submission dated September 12, 2008, CN has advised that they are not intending to develop an intermodal facility, but a rail based employment area. 1,100 ha of employment need have been identified for the Region to 2031 which includes approximately 200 ha in south Milton adjacent to the rail line.
	 If there is a CN node planned for south of Hwy 401, a buffer area of employment lands should be established between the CN rail lands and any proposed residential lands (as in Concepts #1, 2a and 2b). 	We agree that when looking at development around the potential rail based employment area and the Waste Management Facility that appropriate buffers be implemented and land uses introduced that do not create compatibility issues
	The intersection of Trafalgar Road and Britannia Road is right in the middle of the Protected Countryside portion of Halton's Greenbelt. I would not recommend intensifying the corridor in this area as a Potential Mixed Use Corridor (as in Concept #1) in order to adequately protect the Greenbelt and prevent encroachment into it.	Trafalgar Road is a key corridor in the Region and the focus of future investment by both the Region and the Province in terms of servicing and public transit. We feel that it is important to focus on Trafalgar Road, however we also believe that the Natural Heritage System provides a high degree of protection of the natural features through its systems based approach.
	As discussed in Halton's technical studies on <u>Transportation Infrastructure</u> , <u>Air Quality</u> , <u>Human Health and the Built Environment</u> , and <u>Climate Change</u> , improving our public transit system is a key component to improving Halton's poor air quality. Any concept should be developed in tandem with public transit improvements to increase ridership to and from locations <i>within</i> Halton as well as to and from jobs outside Halton. In other words, as a resident of Halton, I am looking for a convenient, affordable, low/no-emission means of public transit to take me to/from grocery stores, malls and community centres within Halton, not just to/from the GO Station. A flexible, environmentally friendly	We agree and one of the principles of Sustainable Halton is transit first. We are looking for opportunities to enhance transit service and increasing ridership through encouraging higher density development, a greater mix of uses and a focus on nodes and corridors.

Source	SUBMISSION	Response
	model of public transit needs to be developed. Thinking out of the box, for example, the "Colectivos" in La Paz, Bolivia and Playa del Carmen, Mexico offer a potential model for Halton Region to consider. Colectivos are vans which carry up to fifteen passengers, traveling around designated routes to destinations other than major transit hubs (i.e., shopping malls, colleges, recreation centres, etc. rather than the GO Stations). I have not addressed the fiscal impacts of any of these concepts. Obviously, the results of a Fiscal Impact Study is a major deciding point as to the practical feasibility of a final concept (vis a vis water and wastewater services, energy and electricity demands, transit and other infrastructure issues, etc.). In conclusion, I would like to emphasize 1) the need for a comprehensive Sustainability Strategy for Halton Region (including its local municipalities) and 2) the need to complete the requisite studies (on Intensification, LEAR, and Carrying Capacity) so that these findings may be incorporated into the development of a final proposal. 3) In addition, if we are to accept growth, the Region should take proactive steps to Grow our Greenbelt so as to achieve landform permanence and the long-term Vision for Halton's future.	The Region is undertaking a financial assessment of the Growth Concepts. A fiscal impact analysis will be completed on the preferred growth option once selected by Council.
Public Commenter #2 September 30, 2008	I would like to add our household's opposition to the "Sustainable Halton" and "Places to Grow" plans. This opposition is necessary for several reasons including the need to determine the sustainable population, the necessity of first finding the funding to finance a plan without the current taxpayer's footing the bill or putting the municipality into bankruptcy and to have the majority of the areas voters in agreement with the plan. Any choice until these issues are resolved is at best premature. In regard to the issue of the sustainable population level of the area, this needs to be determined prior to allowing the population to increase. It would be irresponsible to increase the population without the resources to provide not only for the current population but all new comers as well. This assessment needs to be based on various factors such as available: o recycled aggregate, o potable water, o arable farmland, o electricity production infrastructure, o transit/motor vehicle infrastructure, o local services infrastructure including schools,	The following response was prepared in October 2008 in response to the submission received: The Region has received your email dated September 30, 2008 regarding the Sustainable Halton Plan and the Places to Grow Plan. Thank you for providing your detailed comments. Your feedback is appreciated. You raise a number of valuable perspectives related to sustainable population levels, the preservation of farmland, fossil fuel reserves and the NAFTA proportionality clause, and potable water supplies. We thank you for your interest in the Sustainable Halton process and for providing input on these important topics. Your comments will be considered as part of the Sustainable Halton process. The Region appreciates your
	o transit/motor vehicle infrastructure,	The Region appreciates your concerns regarding the determination

Source	SUBMISSION	Response
Source	Submission o fossil fuel resource availability, o landfill/waste removal, o current infrastructure deficits, o municipal, regional, provincial and federal debt loads, o noise and air pollution, o the effect on wildlife and maintaining sustainable levels of green areas and corridors, o and our ability to meet our obligations to reduce overall pollution to stop climate change. This has to be considered based on future resource levels that will be dramatically affected by climate change and the end of cheap fossil fuels. Our own Liberal Party Leader, Stephan Dion and our Green Party Leader, Elizabeth May acknowledge that we have reached the end of the cheap fossil fuel era which will significantly impact these plans. Additional arguments regarding the end of the cheap fossil fuel era are provided by numerous credible resources from both governments and private sectors such as the: o United States Government Accountability Office Report to Congressional Requesters – February 2007: Crude Oil Uncertainty about Future Oil Supply Makes It Important to Develop a Strategy for Addressing a Peak and Decline in Oil Production', Facing the Hard Truths about Energy: A Comprehensive View to 2030 to Global Oil and Natural Gas, for the United States Government	RESPONSE of a sustainable population level for Halton Region. While the Province's Places to Grow Plan has identified population forecasts for Halton Region, the long term growth and distribution of population within the Province and the Country is an important issue that warrants further attention from all levels of government. With respect to farmland and opportunities for preservation in Halton Region, as part of the Sustainable Halton process, the Region has undertaken a LEAR Study (Land Evaluation/Area Review) to identify areas of prime production potential within Halton. While we recognize that accommodating projected population growth in Halton Region to 2031 will require development on lands identified as prime agricultural as identified by Places to Grow, it is also recognized that there is a sufficient land base remaining to support a viable agricultural industry.
	Terry Backer, o U.S. Representative Roscoe Bartlett,	represents Halton's fundamental value in land use planning and will
	o Talisman Energy Inc. former President and CEO (former President and COO for BP Canada) Jim Buckee,	guide decisions and actions on proposed land use changes accordingly. Furthermore, the natural
	 California Energy Commission (retired) John Geesman, Barrelmore Ltd (retired Chief Petroleum Engineer for BP) Jeremy J. Gilbert, 	heritage system has been identified as a key component in the Sustainable Halton process and towards the identification of future
	o Geological Survey of Canada senior scientist and geologist's David Hughes,	growth areas. Regional Council has endorsed the recommendation that
	 Dr. Robert Hirsch University of Victoria's professor Andrew Weaver, 	the Sustainable Halton Plan implement the principle of an
	o Oil and Gas Tycoon Boone Pickens,	enhanced natural heritage system.
	o The Wall Street Journal's Neil King,	This system has been applied as a
	o Colorado Geological Survey's State Geologist and Director Dr. Vincent Matthews,	starting point from which all growth concepts begin.
	 Alaska Geological Survey's retired senior petroleum geologist 's Gil Mull, 	The Sustainable Halton Plan strives
	o Simmons & Co. International, Chairman Matt Simmons,	to be as transparent a process as possible, and is structured around

Source	Submission	Response
Source	O Oregon Department of Energy's Senior Policy Analyst John Kaufmann, O Columbia University's professor Sally Odland, O Colorado State University's professors Kyle Saunders, John Theobald and Ken Veorsub, O University of California's professor Dan Sperling, O Davis Graham & Stubbs LLP's Jeff Vail, O Colorado Governor Bill Ritter's Energy Office's Morey Wolfson. to name only a few documents and individuals. One of the impacts of the end of cheap fossil fuels is the end of cheap gas to ship food over long distances, to run large farm equipment and also an increasingly more expensive and smaller supply of fertilizer. This will significantly impact how we farm and were we get our food supply. Prior to paving over any more farmland, we need to make the responsible choice to ensure that with the rising costs and restrictions that we have sufficient farmland to feed the local population. Therefore, under future conditions, how much farmland is required to meet the current population and any increased population? How much land is available for development after the farmland and necessary greenlands, etc is allocated? It must be asked "How will everyone get around in a world with \$150-\$200 or even \$300 a barrel of oil? How will we maintain the current infrastructure with the economic and supply impacts that this will have? Are we even able to meet the current population's needs and how many more people can be support under these conditions? It should be noted that under the current Free Trade Act, the closed doors negotiation of the SPP and Canada's lack of energy security plan that the issues of oil, natural gas and potable water will be made worse unless this legislation is renegotiated. This was pointed out by University of Alberta's professor, Gord Laver. Since there is no strategic reserve, no longer a minimum 25 years proven reserves prior to exporting with an obligation to ship large quantities of resources to the US before providing for all Canadian needs it lead to Professor Laxer stating to our government	continued opportunities for public engagement through workshops and public open houses. The Region welcomes the opportunity for public feedback at any point of the Sustainable Halton process and incorporates this feedback into subsequent work. In addition to providing your comments to the Region, I would also encourage you to continue to communicate your views to your Local and Regional Council representatives. Ultimately, the Sustainable Halton Plan will be brought forward to Regional Council for approval and will be a collective decision endorsed by the members of Regional Council. Halton Region has recently embarked on a number of initiatives under the umbrella of the Region's sustainability initiative. The position of Senior Policy Analyst – Sustainability was created to be responsible for co-ordinating and communicating the Region's environmental initiatives. Two key initiatives are the development of a Corporate Sustainability Plan, which will focus on the functions and decisions made within the organization, and an Integrated Community Sustainability Plan, which in consultation with community stakeholders, will provide direction for the community to realize sustainability objectives. Linda Axford, the Region's Senior Policy Analyst – Sustainability, is also responsible for providing strategic advice on sustainability and climate change, and for developing policies and implementation strategies based on research and public input. The Region recognizes the increasingly important role that these initiatives have from an organizational, community, and regional perspective.

Source	SUBMISSION	Response
COUNCE	connection to the Peel municipal water or a pipe from the lake unlikely. It would seem irresponsible to both the current population and any new population to knowingly increase the number of users when there is already the expectation of potable water shortages by our own government. So, how many people will there be sufficient potable water for and where is it going to come from? Will there be sufficient potable water for an increase in population?	ALOI ONOL
	It is noted by our own government that our infrastructure is billions of dollars in deficient including our electric grid. The "Sustainable Halton" and Places to Grow" plans require greater infrastructure when the current infrastructure is already in deficit. If we can not keep up with the current infrastructure, how does the government expect to create more? Where will the money come from especially given municipalities increasing struggles to maintain current infrastructure, a slowing global economy and the end of cheap fossil fuels?	
	Canada has failed in its obligations to the world under the Kyoto Accord. The current population and government have not been able to make the required changes and reductions. It is irresponsible to offset the conservation efforts that the current population must make by increasing the populations who will consume any savings and potentially increase our emissions? This is neither fair to the current population nor those that would come here. Therefore, how under the "Sustainable Halton" and "Places to Grow" plan will the necessary reductions be achieved?	
	The "Sustainable Halton" and particularly the "Places to Grow" plans have not asked the basic necessary questions, nor do I suspect that our academics and experts would support the concept that further growth is "sustainable". As the elected leaders, the people need our leaders to hear our academics, scientists and other experts to make the best informed decisions. Until we know what level of population and resources are required and that they will be available in both the present and the future, the people and all levels of government have a responsibility and obligation to answer these questions before proceeding. Additionally, within a democracy, increased growth, significant changes and challenges should not be undertaken by the representatives of the people unless the people are in favour of it. Until this is know through a referendum or similar tool the "Sustainable Halton" and "Places to Grow" plans is not democratic given the opposition that has been expressed.	
	The government and the people have a responsibility and obligation to make informed and sustainable choices within our resources and budget for both ourselves and future generations. If this can't be met by the "Sustainable Halton" and "Places to Grow" plans then we have the obligation both not to put it into place and not against the will of the people.	

Source	SUBMISSION	Response
	As a result, unless the "Sustainable Halton" and the "Places to Grow" plans can successfully show that they are both sustainable and supported by the people no version of either of these plans will be supported by this household including at the polls.	
Public Commenter #3 September 30, 2008	Please do your best to make sure that we do obtain the goal of having 40% of our development for the next planning period coming from infill development, rather than green fields. If this is not currently economically feasible, we need to somehow subsidize this infill type of development with revenue from Greenfield development because development will not be sustainable if we don't achieve this target.	As required in the Provincial Growth Plan, through the Sustainable Halton process, the Region is planning for 40% of all residential development to occur within the built-up areas of the Region (as defined by the Growth Plan), beginning in 2015 and each year thereafter. Intensification represents a key component of the Sustainable Halton process that will reduce the amount of rural land required to meet the Region's population forecast, make better use of existing infrastructure and promote more pedestrian, and transit friendly neighbourhoods.
	Here's a bit of a "rant" on how I see things not just in Halton, but in Canada overall. Hopefully, you can cut through the emotion and still understand my point here: Can we begin to monitor change in this country (rather than static statistics), and respond to that change? For example, is there currently an influx to the cities and a flow of people out of the rural areas in Canada? And is poverty increasing in the cities or in the rural areas? How do we define poverty? Is a person living near his or her work in a rural community, walking to work and earning minimum wage not better off than a person in a large city, working long hours to afford housing and transit losing many hours of their life to commuting? Can we incorporate "quality of life" into our definition of "poverty" and begin to focus on "Hope" rather than "Despair"?	Halton Region is committed to
	prime agricultural land, distancing ourselves and our children from a connection with the food that sustains us? Canadians are fortunate we have a country that is rich in resources and natural heritage. Please help us to recognize all of the wealth we possess, including ecosystem health. Alberta has such petroleum resources, but I think we've gone too far by raping the tar sands; would we Canadians not have a brighter future if we focused on being at the leading edge of cleaner, alternative energy technologies such as solar and wind technologies?	supporting a strong and sustainable agricultural community in Halton Region through a foundation of strong planning polices supported by tools and initiatives to support the industry. This strategy is described in <i>Report 3.04: Agricultural Countryside Strategy.</i> Halton Region is focused on fostering a healthier natural environment and also extends that focus to the other pillars of sustainability; social, economical and cultural. As a

Source	SUBMISSION	Response
	Please, as you take the next step in planning Halton's future,	starting point, the Region committed to implementing an enhanced natural heritage system throughout the Region to promote a greater level of environmental protection. The Region has consulted
	please ASK the <u>region's farmers</u> how we can make agriculture sustainable in Halton. There are some beautiful, booming businesses on some of Halton's farms and they provide scenic landscapes that carry us beyond the reality of huge land development and the toil of humanity in our increasingly densely populated space.	extensively with the Halton Agricultural Advisory Committee in developing Halton's Agricultural Strategy.
	Please fight for the sensibleness of placing high-density housing near major transit nodes. Please ensure infrastructure growth ahead of home-building, and focus on one or two new main north-south or east-west travel corridors, instead of promoting gridlock throughout the Region.	
Halton Hills Resident #1 October 24, 2008	I think Georgetown hospital should be main priority. Last month I was there, of course feeling sick, guess what, well I had to wait for more than three hours to get to see the doctor, well there were a few people from Brampton in front of me waiting for their turn. I have nothing against Brampton but they have a HUGE HOSPITAL there. I think it should be put a big sign in our hospital saying "Only attending locals due to shortage of personnel and equipment" at least until this problem is fixed and hopefully Georgetown gets a bigger hospital. The Second for me is the congested traffic. The town of Halton Hills should INFORM COMPANIES in Halton to give	We agree that all necessary community services (such as hospitals and community centres, etc.) are a priority. The Provincial Places to Grow Plan requires that a Community Infrastructure Plan be completed to deal with the issue you raise, among others. The Region will begin developing the Community Infrastructure Plan once a preferred option is selected by Council and will work closely with other Regional Departments, the Local Municipalities
	more Job Opportunities to locals and stop hiring people from others cities. Now with the gas being so high we need more chances to work in our own town, cause if you notice most of the traffic congestion is happening to go to our neighbours Brampton and Mississauga. These are only thoughts	and other service providers to ensure a plan is developed that adequately addresses community needs.

Attachment #1 to Sustainable Halton Report 3.01

Sustainable Halton Meeting with Mattamy Development Corporation Wednesday, November 20, 2008 Oak Room, 10:00 to 12:00

Present:

Mattamy Team: Region of Halton & Consultants:

Gary Gregoris
Ruth Victor
Anita Fabac
David Schaeffer
Tom Hilditch
Jeannette Gillezeau
Andrea Gabor
Laurie Payne
Mirek Sharp
Russell Mathew

Perry Vagnini

1) Team Introductions

Gary introduced the Mattamy team and Ho introduced Laurie and Andrea (Urban Strategies Inc.) as the Region's principal consultant for Sustainable Halton and Mirek Sharp (North-South Environmental Inc.) as the Region's consultant working on the natural heritage system.

Gary thanked the Region for the opportunity to meet and discuss Mattamy's concerns with the Sustainable Halton process and expressed his overall frustration with the Sustainable Halton process to-date. In particular, he noted that Mattamy did not agree with the Enhanced Natural Heritage System for Sustainable Halton and directed the group to the letter submitted by Lynne Townsend (dated September 24th, 2008) detailing Mattamy's concerns with Sustainable Halton.

Ho advised that the Sustainable Halton process is working to ensure that everyone has a chance to input into the process and that the process is fair and transparent. He noted that any new information discussed today would be on the public record. Ho also advised that any specific request for information that is beyond what is currently on the public record, should be provided in a letter to the Region and he will ensure that a response is provided in a timely fashion. If meetings are held with other landowners, the discussions will also be a matter of public record.

Ruth provided the agenda for the meeting which was based on the letter from Lynne Townsend (dated September 24th, 2008) on behalf of Mattamy.

2) Status of Update Reports and Future Growth Options

Ho referred to Regional staff Report LPS36-08 (before Regional Council yesterday), in his update on the timing of Sustainable Halton. He noted that the Region has advised the Province of a 6 month delay to the Sustainable Halton process to December 16, 2009. The Region is looking to have a final list of five growth options by March/April 2009 with a preferred growth option chosen by the summer of 2009. Additional studies on the NHS, Aggregates and Agriculture are scheduled to accompany the release of the five growth options. A fiscal impact analysis will be prepared for

each of the five growth options. However, given the complexity and amount of work associated with the fiscal impact analysis, they may follow the release of the five growth options.

In response to a question from Gary on the additional work needed to complete the land supply component of Sustainable Halton (which is based on the intensification work of the Local Municipalities), Ho noted that a technical report addressing this issue will likely be released at the same time as the other technical reports (e.g. aggregate, farmland, NHS). The public will have at least a month to review the five growth options.

3) Status of Consultation Process on the Five Concepts and Shortlist of Options

As item 3 on the Agenda, Consultation, had already been addressed there was no more discussion of this item.

4) Evaluation Criteria

Ruth noted that Mattamy had previously provided the Region with comments on the Evaluation Framework. Ruth noted that they cannot see how the comments have been addressed by the Region. Mattamy is concerned over the NHS and what it considers undue weight assigned to it in the Evaluation Framework and the lack of balance with the other objectives of the PPS and PTG. Ruth asked for clarification on how the Evaluation Framework was going to be used in the process. Ho noted that the Evaluation Framework will not be used until all the technical information is available. It will be refined and the consulting team, staff and agencies will be applying it to the five growth options. Ultimately, Council will use the results of the evaluation, as well as input from the public, to determine the final preferred option. The Region will be engaging the public through workshops to explain the application of the Evaluation Framework and invite the public to use the Framework in expressing their preferences. Andrea provided an overview of how the Evaluation Framework was developed and noted that there is still some "tweaking" to be done. Ho indicated that if earlier comments were not addressed, they will be addressed in the next steps of this process.

5) Principle of Balance

Gary noted that he can not find any responses to the comments provided by Mattamy on the Evaluation Framework. It was noted that a response was prepared by the Region which did address the questions related to the Evaluation Framework (letter dated July 10th, 2008). Ruth noted that the letter did not address all of the concerns raised. Gary also expressed concern that the Provincial Policy Statement (PPS), specifically the economic and social pillars of the PPS, have not been given equal consideration as the environment within the Evaluation Criteria. Andrea noted that they have been interwoven through the other criteria and in her view the Evaluation Framework does not place a primary importance on the NHS.

Tom commented, in reference to the Environmental Commissioner of Ontario's Report, that he would like to see the Province appoint a "Sustainability Commissioner" to provide balance and that at present there is an "Environmental First" approach.

Ruth noted that Working Paper #1 lists the NHS as a priority and she does not see the planning "balance" discussed in the Region Official Plan or the PPS. Ho again suggested that Mattamy provide the Region with a letter outlining their concerns and he would ensure that they are addressed.

With respect to Option 3 of the NHS, Ho noted that support for an enhanced NHS, which may or may not be interpreted as Option 3, is on the Council record. Staff will ensure that the selection of the final version of the NHS is a topic for Council deliberation. He suggested Mattamy provide the Region with further comments on Option 3 and identify the changes they would like to see to the NHS.

6) Natural Heritage System.

Tom indicated that the Region's current environment first approach is too extensive and there is the need to look at a balance where the NHS can be more effective. The Region needs to leave flexibility in the NHS as there is not the detail to be making firm lines at this time. While he expressed concern over the NHS being "cast in stone", he is also aware that it will be adjusted. Tom advised that, in his work for Mattamy, he has been collecting seasonal information and offered to provide the Region with assistance in the analysis of the NHS. Ho noted that Regional Council has placed considerable emphasis on the NHS in the Sustainable Halton exercise. He also noted that the Region has heard similar comments from other parties on the NHS, especially with respect to the Centres for Biodiversity. He suggested that Mattamy needs to see a full picture of the Region's approach and the flexibility that is associated with it once North-South Environmental has completed their work.

Ruth asked if the Region was going to be stepping back from the current approach to the NHS? Ho noted that a consistent NHS system will be applied to all five options and that the Region needs to start with a base case. The direction from Council indicates a strong preference for an enhanced NHS.

Gary questioned the Region's calculation of net density which differs from the approach set out in Places to Grow. Anita noted that the Region's definition goes beyond the approach in Places to Grow. Ho advised that the Region is producing a technical paper that will address this and that the Region will be discussing its approach with the Province. Russell noted that Halton is following an approach to density that is consistent with what is being done in other municipalities in the GTA.

Tom asked for additional information on the background work to the NHS and on the coverage of the NHS. He indicated that he would like more information on how the size of the NHS was determined, what targets were used, how linkages were determined, etc. He wanted clarification on how linkages over agricultural lands were determined as he did not feel they could be supported from an ecological basis. Ho advised Tom to put his requests in a letter and the Region will respond to them. Tom suggested that his issues and concerns could be addressed in a submission or a working session with North – South Environmental and the Region. Ho emphasized that the focus of the Region at this stage is at a high level and that subsequent stages of the planning process will be able to address Mattamy's issues at that time. Furthermore, Mattamy needs to see the Region's policy context for the NHS.

Tom advised that he has comments on the boundaries of the NHS as they pertain to the Mattamy lands. Ho suggested that the consultation at this stage should address the overall system and any detailed issues may need to be addressed at a later date. He also advised that the Region may not be able to respond to specific issues at this time. The Region will have to go down the development process further before specific issues can be addressed.

Gary expressed concern over how the policy would address parts of the enhanced NHS that Mattamy believes should not be included. In his view, the policy should allow for the reduction, elimination or increase in the NHS. He asked for a high degree of flexibility and had no confidence that it would be provided. Gary also indicated that he did not believe the NHS was "science based" (i.e., based on seasonal field work and on-site assessments). Ho suggested that Mattamy provide examples that would assist Mirek to further his policy work. He also suggested that Mattamy look at the next round of the Region's policy framework.

Mirek provided an overview of his work emphasizing that he is working down from the general to the more detailed. He is also considering the issues that Tom raised today. Mirek indicated that he would welcome any data that Tom has that could inform the process, but noted that he would not analyze any of this data as his work is at a Regional scale. Ho again advised that all information would be on public record and the level of detail being discussed is more appropriate at the subsequent planning stages following the Sustainable Halton process.

Tom expressed his disagreement with the top down approach as he feels that detailed information on a property can help in other areas and contribute to the principles behind the policy framework. There was discussion on how this issue could be addressed. Tom suggested a working session to look at Mattamy's holdings and explain what's been done and where the lines are on the properties. Ho indicated that he would prefer to see Mattamy's submissions outlined in a letter to the Region.

Gary re-iterated his concern that the policy framework will not allow the elimination of lines and that once it is out in the public there will be less opportunity to change it. Ho noted that Mirek is providing a "Desktop" version of the NHS, and the policy framework accompanying the proposed NHS will detail how firm lines are and what flexibility there is.

7) Employment Land – Strategic Lands

Jeannette noted that it appears that the amount of employment lands is the most significant concern at the local level. Gary suggested that if the Region wants to protect the employment lands, then Mattamy and the Region should work collectively in addressing this issue with the Province so as to avoid infrastructure mistakes that were made in North Oakville. In response to Gary's comments on the infrastructure, Ho noted that: 1) the Region did not have the money to assume the oversizing cost of all the infrastructure; 2) the Region needs flexibility and there are infrastructure policies in the OP; and 3) that the Region can only service one employment area at a time.

8) Infrastructure

Dave is of the opinion that infrastructure has not been given enough importance through the Sustainable Halton process to date. While infrastructure is identified as a fundamental planning principle, the background reports are generally silent on infrastructure availability and cost implications. Dave suggested that Sustainable Halton is currently casting a large shadow over infrastructure decisions currently being made in South Halton. As an example Dave, noted the benefits of oversizing planned sewers in South Halton at a minimal cost in order to protect for future development in Georgetown and the 401 Corridor in a time effective and cost effective fashion.

Jeannette noted that it is unrealistic for future industrial clients to front end costs and therefore it is important to think of the physical relationship between the yellow (res/mixed use) and the blue (employment lands). She also believes it is important to establish this relationship to avoid problems 20 years from now. Gary noted that there is a +large amount of potential employment areas being considered and that it is not all affordable. Ho suggested that this is the justification for a tight phasing plan. Ruth noted that the NHS system will create huge costs to the infrastructure.

Dave noted that the infrastructure costs have typically become available at the end of the planning process, through D.C. by-laws and Regional allocation programs. The financial sustainability of the community infrastructure is one test that is critical, and cannot be deferred. If development cannot afford the infrastructure costs, no development will proceed, regardless of the planning merits. It was Dave's opinion that this critical information should have been included as part of the selection of the preferred alternatives. Andrea confirmed that infrastructure will be considered through the Evaluation Framework. Ho noted that you also have to look at the planning principles and not just infrastructure. The Region is also addressing concerns raised by the Local Municipalities and costing will be issues at the next stage of Sustainable Halton.

Gary provided an overview of Mattamy's growth option. Some of the key points of their proposal include:

- 20,000 population growth in Georgetown;
- Employment concentrated around the CP Intermodal site;
- Employment lands beyond 600 ha
- University Village is not part of the residential lands area as too different
- "Orange areas" build on existing communities; and
- Ninth Line lands are already in the Urban Area.

Gary noted that Mattamy has discussed the need for identification and protection of long term employment lands in the Region with the Province. Ho advised that the Province sits on the Region's Inter-Municipal Technical Committee. He also noted that if Mattamy has further submissions to support their option they should put them in a letter to the Region. The Region will also be taking Mattamy's option into consideration with all other submissions.

9) Next Steps/Timing

These issues were addressed at the beginning of the meeting.

10) Adjournment

The meeting adjourned at 12:00 p.m.

Minutes prepared by Perry Vagnini