Tuesday, September 30, 2008

Halton Region
Legislative and Planning Services Department
1151 Bronte Road
Oakville, Ontario
L6M 3L1

RE: Sustainable Halton ~ Five Growth Concepts

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 10th Side Road and 9th 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 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 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.

**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 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 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 Planning 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.

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.

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.

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.

**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 inter- and 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.
CONCLUSION

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.

Regards,

Joshua Kaufman
Director, Land Development
(905) 760-6200 ext. 7635

cc:
Bill Anderson
Business Development Officer, Halton Region
September 30, 2008

Halton Region
1151 Bronte Road
Oakville, ON
L6M 3L1

Attention: Clerks Department
Halton Region
Sustainable Halton Plan

Dear Sir/Madam:

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: 15th Sideroad to the north, 8th Line (Main St.) to the East, 10th 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 no more that 20,000. The South West Georgetown lands not 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 locally 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 addition 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 an enhanced live/work relationship.

In terms of servicing, the South West 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 determine appropriate servicing options. In the event groundwater servicing is not feasible to accommodate an expansion to Georgetown, servicing may also be available via an 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 professional 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 developments, etc.) with a view to early delivery of community infrastructure.

Our clients remain concerned with the proposed Enhanced Natural Heritage System ("ENHS") as illustrated on the Growth Option Schedules and believe it overstates some of the features and that there are 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.
The South West Georgetown Landowners Group remain of 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.

Yours truly,
TOWNSEND, ROGERS LLP

Lynda J. Townsend
Partner

c: Bruce MacLean
   Dennis Perlin
   Mitch Zamojic
   Mark Meneray
   Peter Campbell
September 30, 2008

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

Dear Sirs,

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”.

- 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.

- 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 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.

- Consideration should be given to the CN Lands in behind the Halton Waste Management Site.

**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.

**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 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?
Concept 2a – Milton and South Georgetown

- 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.

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 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.

Concept 3b – Milton and South / Southwest Georgetown

- 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.
Should you wish to discuss these comments further please call the undersigned.

Regards
Total Developments International Inc.

[Signature]

Grahame Rice, Vice President
September 30, 2008

Ms. Anita Fabac,
Acting Manager,
Long Range Planning
Halton Region
1151 Bronte Road
Oakville, ON L6M 3L1

Dear Ms. Fabac:

RE:  TRAFALGAR GOLF AND COUNTRY CLUB
SUBMISSION FOR CONSIDERATION IN THE
REGION OF HALTON'S SUSTAINABLE HALTON
MHBC FILE # 07130A

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 63 ha 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 golf 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; and (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 options 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 16th, 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.

**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 400-series highways, particularly Highway 401, as this is recognized in all 5 Growth Concept alternatives.

- 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 3B ultimately represent the greatest flexibility for permitted uses in the future due to the potential Mixed Use/Residential category.

- 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 be among the last to be serviced.

- The Altus 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.

- 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).

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.

Yours truly,
MHBC Planning

(FOO) Debra Walker, MBA, MCIP, RPP

C: Martha Watson
   Gord Petch
   Chris Crozier
   Kevin Trimble
   Alex Manefski
September 30, 2008

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

Attention: Ms. Anita Fabac, Manager of Planning

Dear Anita:

RE: Sustainable Halton Working Paper #1 - Locating New Urban Land
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 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;
   - 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,
   - 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 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.

2. 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 Britanna Road immediately south and east of the subject lands;
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;

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 employment land to the year 2031 as provided for in
the Paper on Planning for Employment.

The Region’s Comprehensive Economic Development Strategy indicates that the key
goal is to offer a sufficient reserve of well-located employment land designations providing
choice, competition and flexibility in the land market. In this regard, Regional staff recently
provided a response to the Province on the Paper on Planning for Employment (LPS07-08)
focusing on the need to designate a reserve supply of future employment lands beyond the 20-
year planning horizon to provide a complete range of strategically located competitive
employment lands in the Region. The subject lands do not meet the Region’s economic
development strategy vision as these lands will become even further undesirable and less
competitive as other more competitive and viable employment lands are designated through the
Sustainable Halton Plan process.
In summary, we are of the opinion that the Region’s advancement for the redesignation of these employment lands to Mixed Use/Residential will also achieve the following:

1. The Region’s vision of landform permanence is achieved by using these lands for more desirable and appropriate compact mixed-use residential uses that support transit-oriented development;

2. The Region’s definition of sustainable development is met as leaving these lands as employment will compromise the ability of the Region to plan and ensure that more competitive employment lands are developed to maximize land utilization;

3. The principle of complete, healthy and sustainable communities and the adequate provision of housing through a logical extension of the existing community is promoted;

4. The Region’s ability to capture the concept of urban separators is not impacted;

5. The Town’s and the Region’s economic prosperity is encouraged by ensuring that as much of the viable and competitive employment lands are serviced and developed and will ensure that more lands are designated along the Highway 401 and Highway 407 corridor or other desirable areas such as the CN Lands; and,

6. Adequately address the need for new residential and employment lands that provide a complete community and contiguous extension of Mixed Use/Residential development from the existing urban communities.

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.

Yours very truly,

GLEN SCHNARR & ASSOCIATES INC.

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

cc: Mario Belvedere, Mel Iovio & Bill Mann, Town of Milton
    Mark Maneray, Region of Halton
    Jacqueline Weston, Region of Halton
September 30, 2008

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

Attention: Ms. Anita Fabac, Manager of Planning

Dear Anita:


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.

Our File: 265-014B
Via Email and Mail

RECEIVED
OCT 7 2008
HALTON REGION PLANNING AND PUBLIC WORKS DEPT.
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 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 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 employment?
6. Do they promote sustainable infrastructure?
7. Do they adequately address the need for new residential and employment lands?

In order to respond to these questions, we have used the Region’s Evaluation Matrix to describe how the subject lands can achieve the Region’s goals and objectives in the Evaluation Matrix. Although we recognize that the Evaluation Matrix may get refined as the SHP process moves forward, we feel that our input using the Evaluation Matrix will enable and assist Regional staff in ascertaining our planning opinion as they go through the similar exercise in evaluating the five growth concepts. The results of the attached Evaluation Matrix support our planning opinion that the inclusion of the subject lands into the Urban Area for Mixed Use/Residential ought to be supported by the Region since the goals and objectives of the Region’s Evaluation Matrix are achieved.

In closing, we understand that the Region is currently reviewing/undertaking the following studies:

- The rationale and mapping updates to the Natural Heritage System as the next phase of reviewing the five growth concepts to determine a short-list of growth options;
- Land budget analysis and density study for updating and/or validating the Mixed Use/Residential and Employment land needs; and,
- Residential intensification study.

We anticipate that we will have an opportunity to supplement our submission herein once these studies are completed and as the Region evaluates the various elements of the five growth concepts to determine a possible short list of two or three refined growth options.
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.

[Signature]

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

cc: Mario Belvedere, Town of Milton
    Mel Iovio, Town of Milton
    Bill Mann, Town of Milton
    Mark Maneray, Region of Halton
    Jacquelaine Weston, Region of Halton
THE BRITTANIA SOUTH LANDS IN THE TOWN OF MILTON

Evaluation Framework: Sustainable Halton Growth Management Strategy

**Theme 1: Protect What is Valuable**

<table>
<thead>
<tr>
<th>Goals</th>
<th>Objectives</th>
<th>Measures</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.1 Protect a resilient and self-sustaining Natural Heritage System (NHS) integrating an 'ecosystem-based' approach that encompasses a connected system of cores of sufficient size to maintain or improve biological diversity and ecological function.</td>
<td>a) Identify and protect core natural areas.</td>
<td>The Britannia South Lands are surrounded on the west, east and south by contiguous natural habitat and future development can protect vulnerable species. The remaining boundary for this area about the existing Milton Urban Area.</td>
</tr>
<tr>
<td></td>
<td>b) Identify and protect centers of regional biodiversity of sufficient area to allow the permanent protection of regional biodiversity.</td>
<td>The Britannia South Lands achieves a high ranking in terms of providing the greatest number of centers of regional biodiversity.</td>
</tr>
<tr>
<td></td>
<td>c) Identify and protect centers of regional biodiversity that represent the two main landscapes in Halton &quot;above&quot; and &quot;below&quot; the escarpment.</td>
<td>Same as above comments.</td>
</tr>
<tr>
<td></td>
<td>d) Provide ecologically functional connections between Halton's NHS and the greater landscape in which the Region is situated.</td>
<td>The Britannia South Lands provide key ecological connections regional connections between Halton's NHS and natural features in adjacent municipalities will be ranked highest.</td>
</tr>
<tr>
<td></td>
<td>e) Protect existing designated natural heritage.</td>
<td>The Britannia South Lands are characterized by major natural features that surround the study area with some minor watercourses that traverse the area. Proper planning of land uses in the Britannia South Lands will avoid impacts to existing designated natural heritage features.</td>
</tr>
</tbody>
</table>

| 1.2 Enhance the NHS to strengthen habitat areas and reduce the impact of new development. | a) Promote existing natural heritage features within a connected system of cores, linkages and watercourses. | As noted above, a larger overall area of natural heritage features surrounding this area can be incorporated into the overall planning of the area. |
|                                                                                     | b) Promote existing natural heritage features within a connected system of cores, linkages and watercourses. | The Britannia South Lands avoid road crossing over the Greenbelt lands. As well, other road crossings the NHS can be avoided or minimized. |
### THE BRITANNIA SOUTH LANDS IN THE TOWN OF MILTON

**Evaluation Framework:** Sustainable Halton Growth Management Strategy

<table>
<thead>
<tr>
<th>1.2 Enhance the NHS to strengthen habitat areas and reduce the impact of new development.</th>
<th>c) Provide alternate connections among natural heritage features.</th>
<th>The principle and system of linkages and open space corridors can be considered and incorporated as part of the overall community plan for the Britannia South Lands.</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.3 Maximize opportunities to protect agricultural land and promote agricultural local food production</td>
<td>a) Protect a contiguous agricultural land base to ensure critical mass.</td>
<td>A significant amount of contiguous agricultural land in west and east Milton and south Halton Hills are retained.</td>
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<tr>
<td></td>
<td>b) Ensure suitable infrastructure to support a variety of agricultural activities.</td>
<td>The Britannia South Lands will not negatively impact on the necessary infrastructure for flexibility in agricultural activities.</td>
</tr>
<tr>
<td></td>
<td>c) Avoid development on lands most suitable for agricultural purposes.</td>
<td>The Britannia South Lands are buffered by NHS to the west and east, which provide the greatest setback from lands most suitable for agriculture.</td>
</tr>
<tr>
<td></td>
<td>d) Prioritize lands used for those agricultural uses that have conditions to support it.</td>
<td>The Britannia South Lands will not negatively impact on the agricultural sector to continue with the agricultural activities.</td>
</tr>
<tr>
<td></td>
<td>e) Minimize impacts of expanding development areas on existing agricultural operations.</td>
<td>The Britannia South Lands do not require mitigation to impacts of new expanding development areas on adjacent agricultural lands due to NHS buffering with the adjacent agricultural lands.</td>
</tr>
<tr>
<td>1.4 Ensure compatibility with surrounding uses through management of mineral resource areas.</td>
<td>a) Minimize encroachment of development onto mineral resource areas.</td>
<td>According to the Primary and Secondary Constraint map provided as part of the Aggregate Resources Strategy Background Report prepared by Meredian Planning Consultants Inc. for the Region, the Britannia South Lands may have small areas of bedrock resources and tertiary sand and gravel in the area. However, most of these potential resources are within the protected valleyland systems. As such, development of the Britannia South Lands will have the least amount of development on mineral resource areas compared to other potential.</td>
</tr>
</tbody>
</table>
**THE BRITANNIA SOUTH LANDS IN THE TOWN OF MILTON**

**Evaluation Framework:** Sustainable Halton Growth Management Strategy

<table>
<thead>
<tr>
<th>1.4 Ensure compatibility with surrounding uses through management of mineral resource areas.</th>
<th>b) Prioritize protection of agricultural areas that support aggregate extraction as an interim use.</th>
<th>Mineral extraction are not impacted and can be retained as the Britannia South Lands do not possess viable aggregates for extraction.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>c) Minimize impacts of mineral extraction on new development.</td>
<td>The Britannia South Lands are well separated from mineral aggregate operations.</td>
</tr>
<tr>
<td>1.5 Ensure protection of significant cultural heritage resources.</td>
<td>a) Conserve cultural heritage landscapes and archaeological resources.</td>
<td>Significant cultural heritage landscapes and archaeological resources are conserved.</td>
</tr>
<tr>
<td>1.6 Improve Halton Region's air quality and reduce impact on the climate.</td>
<td>a) Minimize emissions of air pollutants and greenhouse gases associated with transportation.</td>
<td>Britannia Road and James Snow Parkway corridors provide an idea central transit linkages in this area that would provide the greatest potential to increase inter-regional multi-modal transit opportunities. The Britannia South Lands is contiguous with existing Milton urban area and can be readily serviced by extensions of planned transit services.</td>
</tr>
<tr>
<td></td>
<td>b) Minimize emissions of air pollutants and greenhouse gases associated with energy use in buildings.</td>
<td>The Britannia South Lands can accommodate targeted residential and employment uses with the fewest number of acres.</td>
</tr>
<tr>
<td></td>
<td>c) Use open space, the natural heritage system and agricultural land to reduce emissions of air pollutants and the &quot;urban heat island effect&quot;.</td>
<td>Agricultural land and natural heritage system will be preserved.</td>
</tr>
<tr>
<td></td>
<td>d) Preserve agricultural land and the natural heritage system to reduce the impacts associated with extreme weather events.</td>
<td>Same as above comments.</td>
</tr>
<tr>
<td></td>
<td>e) Preserve the natural heritage system as a carbon sink for greenhouse gases.</td>
<td>Same as above comments.</td>
</tr>
</tbody>
</table>
**THE BRITANNIA SOUTH LANDS IN THE TOWN OF MILTON**

**Evaluation Framework: Sustainable Halton Growth Management Strategy**

**Theme 2: Foster Complete, Healthy, Sustainable Communities Throughout the Region**

<table>
<thead>
<tr>
<th>Goals</th>
<th>Objectives</th>
<th>Measures</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.1 Promote appropriate intensification to meet the full range of current and future needs.</td>
<td>a) Encourage redevelopment of underutilized urban land.</td>
<td>The designation of Britannia South Lands for Mixed-Use/Residential will not compromise the Region's consideration for exceeding Places to Grow targets of 40% of new development within the built boundary.</td>
</tr>
<tr>
<td></td>
<td>b) Plan for a full range of housing, taking into account affordable housing needs.</td>
<td>The Britannia South Lands will allow full opportunity to accommodate a range of low, medium and high density housing, while meeting Places to Grow targets of 40% of new development within the built boundary.</td>
</tr>
<tr>
<td></td>
<td>c) Development along nodes and corridors shall occur at densities that are transit supportive.</td>
<td>Britannia Road and James Snow Parkway mixed use corridors and other future transit corridors in the Britannia South Lands will meet or exceed transit supportive densities (greater than 35UPH or 180 jobs per hectare).</td>
</tr>
<tr>
<td></td>
<td>d) Locate the most intensive development around the provincially designated Urban Growth Centers.</td>
<td>The Britannia South Lands provide opportunity to provide higher density development (i.e. Britannia Road and James Snow Parkway node) to plan for densities in the range of 200 jobs/persons per hectare.</td>
</tr>
<tr>
<td></td>
<td>e) Reduce the amount of land required for development outside the urban area by increasing the density of new development.</td>
<td>The Britannia South Lands are ideal for ensuring that opportunities are provided to plan at densities that may exceed Places to Grow targets of 50 people and jobs per hectare.</td>
</tr>
<tr>
<td></td>
<td>f) Provide for a balance in population and employment growth across Halton Region.</td>
<td>The Britannia South Lands provide an appropriate balance of jobs and housing and it is located near key employment zones, so as to reduce commuting and improve transit modal split.</td>
</tr>
</tbody>
</table>
2.2 Locate new development to enhance access to employment areas, transit corridors, and commercial and community services.

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<tbody>
<tr>
<td>a) Ensure new residential, employment and mixed use development is in close proximity to established communities.</td>
<td>The Britannia South Lands are at the existing urban communities on two sides and this area is contiguous to existing urban area.</td>
<td></td>
</tr>
<tr>
<td>b) Ensure new residential, employment and mixed use development is compatible with existing uses.</td>
<td>The Britannia South Lands are at currently designated residential lands to the west and north to provide the most compatible land uses with adjacent land use, built form, and density.</td>
<td></td>
</tr>
<tr>
<td>c) Ensure new residential areas are supported by the Regional road system.</td>
<td>Britannia Road and James Snow Parkway are already planned for a major road corridors and they provide an excellent connections to Highway 401 and Highway 407. As such, the best use of existing Regional roads will be achieved. As well, these two roads will ensure the greatest potential for people/goods movement capacity to Highway 401 and Highway 407.</td>
<td></td>
</tr>
<tr>
<td>d) Promote travel by transit as an alternative to the private automobile.</td>
<td>Britannia South Lands are in close proximity to the existing and the proposed GO Stations in Milton and public transit at key corridors (such as Thompson Road, Fourth Line, James Snow Parkway, Fifth Line and Sixth Line) provide ample transit linkage opportunities to the two GO Stations to promote and enhance transit ridership and shorter trips.</td>
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2.3 Promote access to green space system.

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<tbody>
<tr>
<td>a) Locate new residential areas where there is potential to enjoy an interconnected green space system.</td>
<td>As noted in other sections, the Britannia South Lands provide close and easy access to the adjacent natural heritage systems as well as urban green space systems for pedestrian and trail linkages.</td>
<td></td>
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</tbody>
</table>
### The Britannia South Lands in the Town of Milton

**Evaluation Framework: Sustainable Halton Growth Management Strategy**

<table>
<thead>
<tr>
<th>2.4 Protect for employment needs to 2031 and beyond.</th>
<th>a) Locate new employment areas near primary transit networks to reduce travel to work by private automobile.</th>
<th>The Britannia South Lands are in close proximity to the Town's existing employment areas and planned transit facilities (GO Stations, local transit terminals and major bus routes) to improve live-work relationships.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>b) Locate new employment areas with direct access to inter-regional and intra-regional transportation networks.</td>
<td>The Britannia South Lands are within easy access to Highway 401 via James Snow Parkway, Highway 407 via Britannia Road and as mentioned previously, easy access to the existing and proposed GO Stations. The Britannia South Lands do not conflict with the location of preferred new employment lands with direct access to rail and highways.</td>
</tr>
<tr>
<td></td>
<td>c) Avoid non-employment related development on those lands suitable for serving employment needs beyond 2031.</td>
<td>The Britannia South Lands do not conflict or interfere with the Region's and the Town's ability to strategically plan for employment areas around highway corridors, CN and CP rail corridors and other employment related infrastructure for future employment needs.</td>
</tr>
<tr>
<td></td>
<td>d) Locate new employment to ensure a viable, competitive and well-functioning land market.</td>
<td>The Britannia South Lands can be easily serviced and servicing of these lands would be contiguous to the master servicing plan and provisions of existing urban areas by the Region.</td>
</tr>
<tr>
<td></td>
<td>e) Locate appropriately sized employment areas.</td>
<td>The Region has indicated that an option that provide for employment areas that are greater than 60 acres in size, and are not fragmented by natural features or other physical constraints will be</td>
</tr>
</tbody>
</table>

| 2.5 Protect and strengthen the Regional Structure | a) Strengthen the Region's structure of urban and rural areas, nodes, corridors, open space and inter-regional connections | The Britannia South Lands will enhance the Region's structure of urban, rural and greenland areas, as well as its framework of Regional and interregional transportation corridors by providing a contiguous extension of existing community in central Milton. |
### THE BRITANNIA SOUTH LANDS IN THE TOWN OF MILTON

**Evaluation Framework:** Sustainable Halton Growth Management Strategy

| 2.5 Protect and strengthen the Regional Structure | b) Maintain and strengthen Halton Region's distinct communities. | The Britannia South Lands will maintain Region's traditions of distinct communities by ensuring that Milton stays as a distinct community separated from the adjacent community to the north, east and south. |

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## Theme 3: Ensure Sustainable Infrastructure to Support Growth

<table>
<thead>
<tr>
<th>Goals</th>
<th>Objectives</th>
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</tr>
</thead>
<tbody>
<tr>
<td>3.1 Make best use of existing water and waste water infrastructure and minimize the need for major new infrastructure.</td>
<td>a) Make best use of existing infrastructure.</td>
<td>The Britannia South Lands will not exert pressure to the Region to implement new urban services, rather ensure that the existing capacity is maximized prior to the upgrade or expansion of infrastructure will be ranked highest.</td>
</tr>
<tr>
<td></td>
<td>b) Minimize the cost of new water and waste water infrastructure.</td>
<td>The Britannia South Lands does not require relatively higher capital cost for water / wastewater infrastructure in comparison to other expansion areas in Milton.</td>
</tr>
<tr>
<td></td>
<td>c) Maximize integration with existing or planned infrastructure.</td>
<td>The Region can augment or supplement the existing planned servicing master plan for the Britannia South Lands that ensures that infrastructure location with other existing or planned infrastructure is well coordinated.</td>
</tr>
<tr>
<td></td>
<td>d) Maximize the use of existing and planned infrastructure.</td>
<td>The Britannia South Lands will not create burden to the delivery of existing and planned infrastructure, and corridors, and it will not adversely create property acquisition requirements to deliver these services.</td>
</tr>
<tr>
<td></td>
<td>e) Ensure financial sustainability for the Region and Municipalities.</td>
<td>The operating and maintenance costs to service the Britannia South Lands will not be more onerous than servicing other urban expansion areas in Milton.</td>
</tr>
<tr>
<td>3.2 Make best use of existing human services infrastructure to minimize the need for major new infrastructure.</td>
<td>a) Ensure intensification growth is supported by human services infrastructure.</td>
<td>Due to its proximity to existing communities and the contiguous expansion to existing communities, the Britannia South Lands will ensure that there is efficient use of the Region's existing humans services delivery.</td>
</tr>
<tr>
<td></td>
<td>b) Ensure new residential areas are supported by locally delivered, responsive human services infrastructure.</td>
<td>The Britannia South Lands will support the capacity to create new viable neighbourhoods that support HUB model for human services infrastructure.</td>
</tr>
</tbody>
</table>
### THE BRITANNIA SOUTH LANDS IN THE TOWN OF MILTON

**Evaluation Framework:** Sustainable Halton Growth Management Strategy

<table>
<thead>
<tr>
<th>3.2 Make best use of existing human services infrastructure to minimize the need for major new infrastructure.</th>
<th>c) Ensure growth is supported by a locally delivered, responsive human services infrastructure.</th>
<th>Due to its proximity to existing communities, the Britannia South Lands will support a neighbourhood HUB model (optimal service radius of less than 2km accessible by means of active transport). The Britannia South Lands will not compromise the Region's ability to deliver human services in relation to residential and employment areas and transit corridors.</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.3 Ensure the long-term reliability and security of essential systems.</td>
<td>a) Locate new residential and employment uses where there is security of water supply.</td>
<td>The Britannia South Lands will require lake-based water supply that can be easily augmented into the existing Servicing Master Plan.</td>
</tr>
<tr>
<td></td>
<td>b) Provide opportunity to reduce infiltration and inflow.</td>
<td>The Britannia South Lands will provide opportunities to implement measures that reduce infiltration and inflow by-pass and reduce risk of basement flooding.</td>
</tr>
<tr>
<td></td>
<td>c) Ensure source water protection.</td>
<td>The Britannia South Lands provide the best protection for raw water sources in order to maintain water quality.</td>
</tr>
<tr>
<td></td>
<td>d) Protect critical infrastructure from adjacent incompatible uses.</td>
<td>The Britannia South Lands support critical infrastructure and will be compatible with adjacent land uses.</td>
</tr>
<tr>
<td>3.4 Financial Sustainability</td>
<td>a) Ensure financial sustainability for the Region and Local Municipalities.</td>
<td>The Britannia South Lands will not create adverse financial impact to the Region, Local Municipalities and on existing taxpayers.</td>
</tr>
<tr>
<td>3.5 Financial Viability</td>
<td>a) Ensure the Plan can be financially implemented.</td>
<td>The financial plan for the Britannia South Lands can be easily implemented, which includes the ability of the development community to front end the growth related capital needs.</td>
</tr>
<tr>
<td>3.6 Plan for a sustainable mature state</td>
<td>a) Plan for a sustainable mature state by ensuring flexibility for infrastructure beyond 2031.</td>
<td>The Britannia South Lands will provide the flexible and cost efficient opportunities to develop infrastructure post 2031.</td>
</tr>
</tbody>
</table>
### THE BRITTANNIA SOUTH LANDS IN THE TOWN OF MILTON

**Evaluation Framework:** Sustainable Halton Growth Management Strategy

<table>
<thead>
<tr>
<th>3.6 Plan for a sustainable mature state</th>
<th>b) Implement plans to phase in the needed infrastructure to 2031 in a manner that integrates both transportation and water and wastewater infrastructure.</th>
<th>The coordinated construction of transportation and servicing infrastructure to meet development demands can be easily coordinated in accommodating future growth within the Britannia South Lands.</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.7 Plan for an integrated transportation network.</td>
<td>a) Ensure suitable transportation infrastructure that accommodates the movement of goods and people both inter- and intra-regionally.</td>
<td>The Britannia South Lands will not impact on the Region's plan for the movement of goods and services both inter- and intra-regionally, particularly as it relates to the Highway 401 corridor.</td>
</tr>
<tr>
<td></td>
<td>b) Promote active transportation and public transit as priority modes of transportation.</td>
<td>The Britannia South Lands will provide maximum opportunity for the movement of people by all modes of travel. The communities within the Britannia South Lands can be planned with land use forms which encourage and promote walking, cycling and the efficient use of public transit.</td>
</tr>
<tr>
<td></td>
<td>c) Maximize the use of existing and planned infrastructure.</td>
<td>The Britannia South Lands will not required additional capital cost for the implementation of new roads. The Britannia South Lands can be serviced by road improvements which are compatible with the established Regional road network and facilitate the extension of James Snow Parkway to an existing interchange on Hwywa 407 at Neyagawa Blvd and facilitate widening of Britannia Road.</td>
</tr>
</tbody>
</table>
## Theme 4: Promote Health For All

<table>
<thead>
<tr>
<th>Goals</th>
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</tr>
</thead>
<tbody>
<tr>
<td>4.1 Promote a culture of conservation (Air, Energy, Water, Waste).</td>
<td>a) Minimize regional air pollution.</td>
<td>The Region can consider increasing neighbourhood, development and regional density; incorporating different land uses within a development or neighbourhood; locating transit near high-density locations by working with the local transit authorities; encouraging pedestrian-friendly designs; centralizing or clustering activities within the Region and incorporating transit development; and, maintaining/increasing vegetative and forest cover.</td>
</tr>
<tr>
<td></td>
<td>b) Encourage the preservation of built heritage inventory.</td>
<td>Cultural heritage and built heritage assets will be identified and protected with the Britannia South Lands.</td>
</tr>
<tr>
<td></td>
<td>c) Encourage the application of high energy efficiency standards and renewable energies to new buildings and whole communities.</td>
<td>An appropriate LEED design can be incorporated into the more detailed planning of the Britannia South Lands to reflect new energy conservation technology; encouragement of private home use of energy efficient water, waste, hydro consumption.</td>
</tr>
<tr>
<td></td>
<td>d) Optimize progressive rehabilitation of mineral resources areas and consideration for appropriate 'after' land use.</td>
<td>The Region will continue to enhance its on-going monitoring role of review/comment and approval of local planning implementation, respecting the achievement of the Sustainable Halton Growth Management Strategy. Implemented through Regional and Local Official Plans, Secondary Plans and Regional Guidelines.</td>
</tr>
<tr>
<td></td>
<td>e) Promote water conservation through community design.</td>
<td>Measures related to the NHS are in Theme One. Additional implementation carried out through the Secondary Plan and Subdivision Planning Stages. The Niagara Escarpment Commission, Conservation Authorities, and the Region will continue to enhance its on-going monitoring role of review/comment and approval of local planning implementation.</td>
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### THE BRITTANNIA SOUTH LANDS IN THE TOWN OF MILTON

**Evaluation Framework:** Sustainable Halton Growth Management Strategy

<table>
<thead>
<tr>
<th>4.1 Promote a culture of conservation (Air, Energy, Water, Waste).</th>
<th>f) Endeavor to protect and enhance the Lake Ontario and Hamilton Harbour Ecosystems.</th>
<th>To be further addressed through the Water and Waste Water Master Plan and Regional Official Plan. Regional Official Plan policies are already in place to support managed shoreline development and the Hamilton Harbour Remedial Action Plan will be considered.</th>
</tr>
</thead>
<tbody>
<tr>
<td>g) Locate new development where it does not compromise the health of the watersheds or impede upon Natural Hazards.</td>
<td>The Britannia South Lands will not compromise the health of the watersheds or impede upon Natural Hazards as appropriate subwatershed studies can be advanced prior to development proceeding.</td>
<td></td>
</tr>
<tr>
<td>h) Promote the implementation of storm water management best practices.</td>
<td>An appropriate determination and design of stormwater management models can be implemented prior to any development proceeding in the Britannia South Lands.</td>
<td></td>
</tr>
<tr>
<td>i) Support an integrated waste management system that follows the waste hierarchy of reduce, reuse, recycle, recover, and infill.</td>
<td>The Region will undertake an integrated waste management strategy and continue to facilitate Halton's monitoring role including review/comment and approval of local planning implementation respecting waste strategy.</td>
<td></td>
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</tbody>
</table>

| 4.2 Ensure provision of human services to support a healthy populations. | a) Ensure the full range of human services and community services are strategically located throughout the community to increase and maximize public access. | The Britannia South Lands provide an excellent opportunity for the Region and the Town to consider planning of additional human and community services such as the second hospital, new civic theatre of performing arts, etc.. |

<table>
<thead>
<tr>
<th>4.3 Foster a variety of uses in downtowns, corridors and other key intensification areas.</th>
<th>a) Designate urban lands to encourage a mix of compatible land uses in commercial, office and residential areas.</th>
<th>The Britannia South Lands provide an excellent opportunity to incorporate mixed use node and corridor areas.</th>
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<tr>
<td>b) Encourage a mix of employment opportunities across the region.</td>
<td>The Britannia South Lands provide a well-balanced employment to population ratio for the Town and commercial/retail employment opportunities for the Region and the Town.</td>
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**THE BRITANNIA SOUTH LANDS IN THE TOWN OF MILTON**

*Evaluation Framework: Sustainable Halton Growth Management Strategy*

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<tr>
<th>4.4 Promote complete communities through excellence in community design.</th>
<th>a) Plan for neighbourhood layouts that are connected to the surrounding street network and support all modes of transportation.</th>
<th>The Britannia South Lands provide opportunities to extend existing road infrastructure and community services from the existing Milton urban area that will ensure compatible community planning to the existing Milton communities.</th>
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<td>b) Plan for an interconnected urban green space system including parks, tree plantings, green roofs and community gardens.</td>
<td>Given the natural attributes within the Britannia South Lands and its surrounding Greenbelt lands, the Britannia South Lands will provide an excellent opportunity for the planning of an interconnected east-west urban green space system that could link the two Greenbelt areas together.</td>
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<td>c) Create walkable communities with mixed land uses, open spaces and connected street networks.</td>
<td>The Britannia South Lands extends the existing Milton urban area in contiguous uniform expansion thereby ensuring an effective and efficient linkages of various neighbourhoods and communities in a walkable layout.</td>
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<td>d) Ensure adequate range of housing tenure for all incomes, ages and family sizes.</td>
<td>The Britannia South Lands will provide opportunities to plan a wide range and mix of affordable housing to existing and future residents into Milton.</td>
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<td>e) Ensure that new development is compatible with or enhances local character and cultural landmarks.</td>
<td>The Britannia South Lands will harmonize character and identity of existing adjacent communities in Milton separated by major road network to create a compatible and unique community design that will support the identity of existing communities.</td>
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<td>f) Develop alternative modes of transportation such as public transit and bike paths that can be used within and between communities.</td>
<td>The Britannia South Lands provide excellent opportunity to implement alternative modes of transportation and bike paths to link between existing and new communities.</td>
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