

WESTON CONSULTING

planning + urban design

September 30, 2022
Weston File Number 10621

Attn: Environmental Registry of Ontario

Dear Sir/Miss,

**Re: Request for Consideration - Inclusion in Future Employment Area
Region of Halton Official Plan Review
Tremaine Road & Campbellville Road, Town of Halton Hills (PT LT 6, CON 1 ESQ,
PT 1, 20R14515)**

Weston Consulting has been retained by the owner of the property municipally addressed as 9104 Dublin Line in the Town of Halton Hills, Regional Municipality of Halton (herein referred to as the 'Subject Lands'). We have been retained, by the owner, to prepare a planning letter in support of bringing the Subject Lands into the Future Employment Area.

Description of Subject Lands Location and Context Area

The Subject Lands are located on the east side of Tremaine Road, west side of Dublin Line in the, and north of Campbellville Road in the Town of Halton Hills. The subject property has three frontages, an approximate frontage of 477.28 metres along Tremaine Road, 804.66 metres along Campbellville Road, and 470.86 metres along Dublin Line. The Subject Land have an approximate area of 78.04 hectares (98.3 acres) (See **Figure 1**, below).



Figure 1: Subject Lands Boundary

The land uses surrounding the subject property are as follows:

North: Agricultural uses.

East: Agricultural uses, and single detached dwellings which have been included in Future Strategic Employment Area of Halton Region Official Plan.

South: Vacant lands which are designated as Urban Area of Regional Official Plan of Halton.

West: Agricultural uses, and single detached dwellings.

The Subject Lands are located in proximity (30- minute walk) of soft infrastructure such as shopping store, School, place of worship, and recreational golf course. In our planning opinion the Subject Land is underutilized, and have potential of being included in Urban boundary (see **Figure 2**).

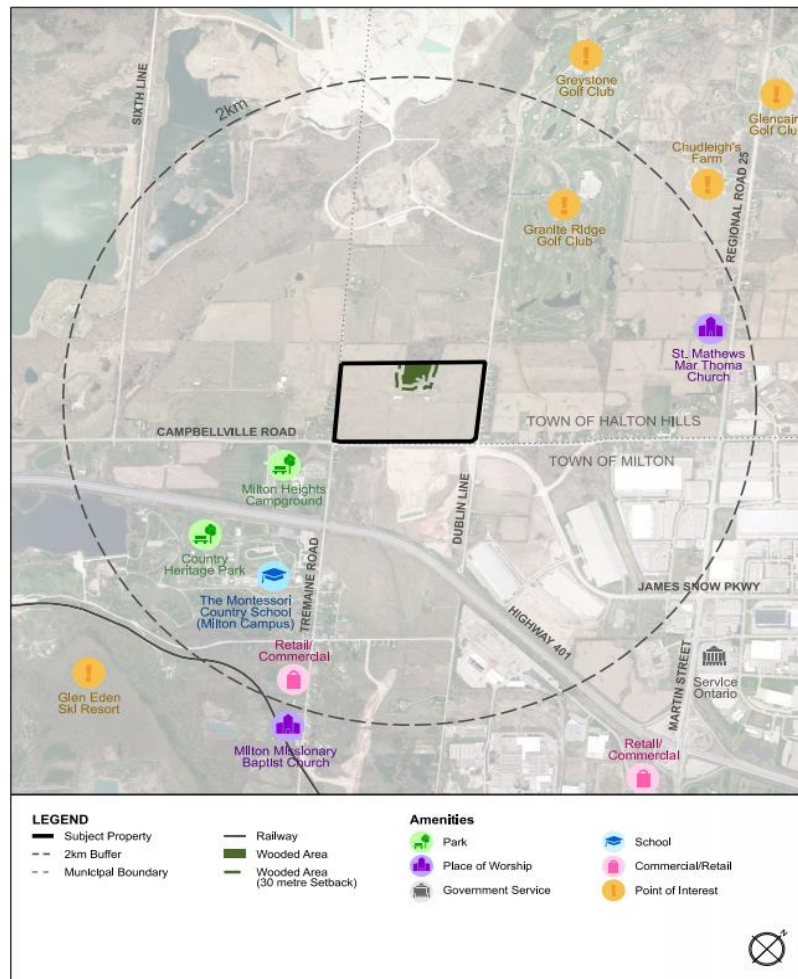


Figure 2: 30-minute walk radius from Subject Lands

Site Context w.r.t. potentials for inclusion in Employment Area:

- The Subject Land is located in close proximity to Highway 401 and Future Strategic Employment Area.
- Furthermore, the Subject Land has frontage to two Arterial roads.

Analysis of Policy conformity chart:

The following summary has been prepared based on a review of relevant Provincial, Regional and Municipal documents:

Provincial Policies	
Provincial Policy Statement 2020	<p>Subject Land is not within Specialty Crop Area.</p> <p>As per Section 2.1.5 of the Provincial Policy Statement (PPS), Development and site alteration shall not be permitted in:</p> <ul style="list-style-type: none"> a) significant wetlands in the Canadian Shield north of Ecoregions 5E, 6E and 7E1; b) significant woodlands in Ecoregions 6E and 7E (excluding islands in Lake Huron and the St. Marys River); c) significant valleylands in Ecoregions 6E and 7E (excluding islands in LakeHuron and the St. Marys River); d) significant wildlife habitat; e) significant areas of natural and scientific interest; and f) coastal wetlands in Ecoregions 5E, 6E, and 7E1 that are not subject to policy 2.1.4(b) unless it has been demonstrated that there will be no negative impacts on the natural features or their ecological functions. <p>Analysis:</p> <ul style="list-style-type: none"> • The Subject Lands are not within Significant Groundwater Recharge Area (SGRA) nor Water Resource Protection Area; • The Subject Lands are not within Municipal Wellhead Protection Zones; • The Subject Lands are not within Identified Mineral Resource Area; and, <p>Sections 3.1 of the PPS states that “Development shall generally be directed, in accordance with guidance developed by the Province (as amended from time to time), to areas outside of:</p>

	<p>a) hazardous lands adjacent to the shorelines of the Great Lakes - St. Lawrence River System and large inland lakes which are impacted by flooding hazards, erosion hazards and/or dynamic beach hazards;</p> <p>b) hazardous lands adjacent to river, stream and small inland lake systems which are impacted by flooding hazards and/or erosion hazards; and</p> <p>c) hazardous sites”.</p> <p>Analysis:</p> <ul style="list-style-type: none"> • The Subject Lands are outside of Natural Hazardous Area. • There are no Provincially Significant Wetlands (PSWs), Areas of Natural or Scientific Interest (ANSIs) or Environmentally Sensitive Areas (ESAs) located on or adjacent to the Subject Lands.
Greenbelt Plan 2017	<p>Subject Land is located inside of the Greenbelt Plan Area.</p> <p>The Subject Lands are designated as “Protected Countryside” within Greenbelt Plan.</p>
Niagara Escarpment Plan 2017	<p>Subject Lands are located inside of the Niagara Escarpment Plan (NEP).</p> <p>The Subject Lands are designated as “Escarpment Protection Area” within Niagara Escarpment Plan. Permitted uses under this designation include:</p> <ul style="list-style-type: none"> • Agricultural uses, Agriculture-related uses and on-farm diversified uses, in prime agricultural areas, Existing uses, Single dwellings, Mobile or portable dwelling unit(s) accessory to agriculture, Non-motorized trail activities and snowmobiling, outside of prime agricultural areas, Unserviced camping on public and institutional land, outside of prime agricultural areas, Forest, wildlife and fisheries management, Licensed archaeological fieldwork, Infrastructure, Accessory uses (e.g., a garage, swimming pool, tennis court, ponds or signs), Institutional uses, outside of prime agricultural areas, Uses permitted in the Parks and Open Space System

	<p>Master/ Management Plans that are not in conflict with the Niagara Escarpment Plan, Home occupations and home industries, and more.</p> <p>As per Section 6.1 (2.3), “Despite subsection (2.2), an application, request or proposal to redesignate land in the Niagara Escarpment Plan to the land use designation of Minor Urban Centre, Urban Area or Escarpment Recreation Area of the Niagara Escarpment Plan or to amend the Niagara Escarpment Plan to permit urban uses may be made during the review set out in subsection 17 (1) and in order for any such application, request or proposal to be considered during the review it must be included in the terms of reference established for the review under subsection 17 (2). 2005, c. 1, s. 25 (1); 2009, c. 12, Sched. L, s. 9 (2).”</p> <p>Analysis: The NEP Area could be re-evaluated when subject to subsection (17), when the overall NEP is subject to review (2027).</p> <ul style="list-style-type: none"> ○ Weston Consulting met with Niagara Escarpment Commission (NEC) staff on September 9, 2021. It was confirmed that next NEP Review would be conducted in 2027, and through this letter we would like to continue our candidacy for inclusion in Urban Boundary Expansion as well as NEP amendment.
<p>A Place to Grow: Growth Plan for the Greater Golden Horseshoe (‘Growth Plan’), 2020</p>	<p>Subject Lands are <u>not</u> located within the Built-Up Area-Conceptual of the Growth Plan.</p> <ul style="list-style-type: none"> ○ As per section (e) and (f), Settlement Area Boundary Expansion of Growth Plan, the expansion in the areas with key hydrological areas, and Natural Heritage System could be permitted. The Subject Lands are not within Key Hydrological Areas. ○ Also, as per section J of the same document, the expansion should meet the requirements of Greenbelt and Niagara Escarpment plans.
Conservation Authority Regulations	
<p>Halton Region Conservation Area</p>	<p>Subject Lands are located <u>outside</u> of Halton Region Conservation regulated area.</p>
Upper Tier Municipal Policy	
<p>Region of Halton Official Plan (2018 Office Consolidated)</p>	<p>The Subject Lands are designated as “Prime Agricultural Area” and “Regional Natural Heritage system” of the Region of Halton Official Plan.</p>

Transportation	
Roadway Classification	<p>Tremaine Road: Major Arterial Campbellville Road: Minor Arterial The subject Property is within walking distance (less than 1 kilometres) from the Highway 401 which is classified as Provincial Highway.</p> <p>Analysis: The Subject Lands are located along arterial roads and has potential of being included in the Urban Boundary and Employment Area.</p> <p>The Subject Lands are within 2 Kilometres of Milton Urban Growth Centre and proposed Major Transit Stations Area (MTSA) of Town of Milton.</p>

Comparative Analysis of Subject Lands vs. Adjacent East Lands

The lands abutting Dublin line to the east of Subject Lands comprise Key Natural Features as shown on Key Features within the Greenbelt and Regional Natural Heritage Systems of Halton Region Official Plan. We note that these lands have been included in the Future Strategic Employment Area as shown on concept 3 of Integrated Growth Management Strategy, dated Feb 2021 (see **Figure 3**). While Subject Lands which are of flat topography and devoid of any significant Natural Heritage features, are excluded from Employment Area. The above-mentioned lands also comprise a watercourse as shown on **Figure 3**.

- 1- The lands to the east of Subject Lands are designated as Prime Agricultural Area, as shown on Map 1E (Agricultural System and Settlement Areas map) of Regional Official Plan. However, Subject Lands with the same designation is excluded from Future Employment Area.
- 2- The Subject Lands are not within Highly Vulnerable Aquifer Area of Halton Conservation Plan, while the lands to the east partially are.
- 3- The lands to the east of subject property, also comprise Key Natural Heritage feature as indicated on **Figure 3**; however, Subject Land exclude any significant Natural Heritage Feature.
- 4- The subject lands have few Historical Feature; however, we would like to note that the adjacent lands to the east of the subject property also include numbers of Historical Feature as indicated on Figure 2 of Archaeological Resources of The Regional Municipality of Halton (See **Figure 4**).

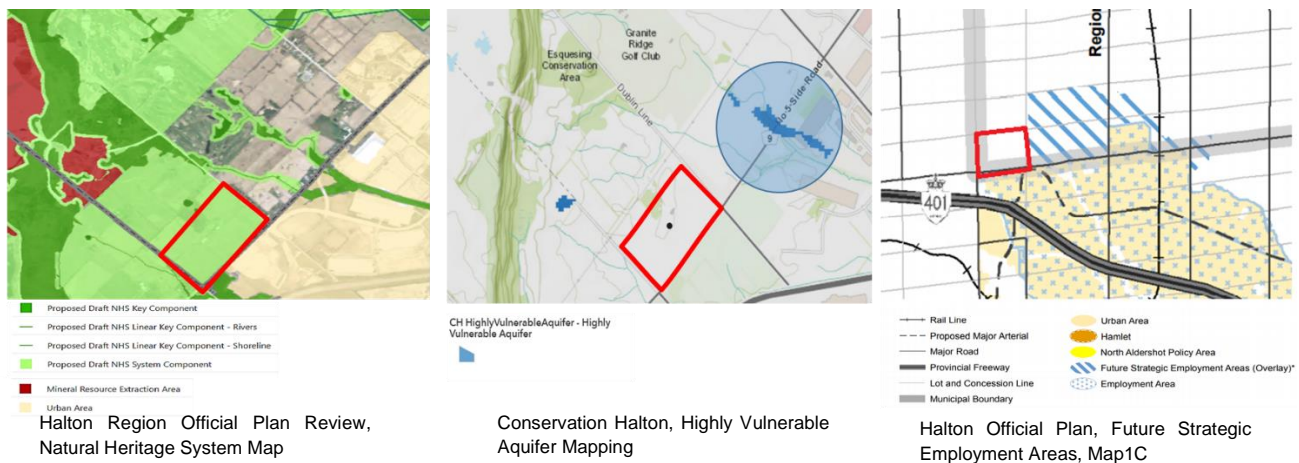


Figure 3: Inclusion of adjacent lands to the east in Future Strategic Employment Area vs. Subject Lands

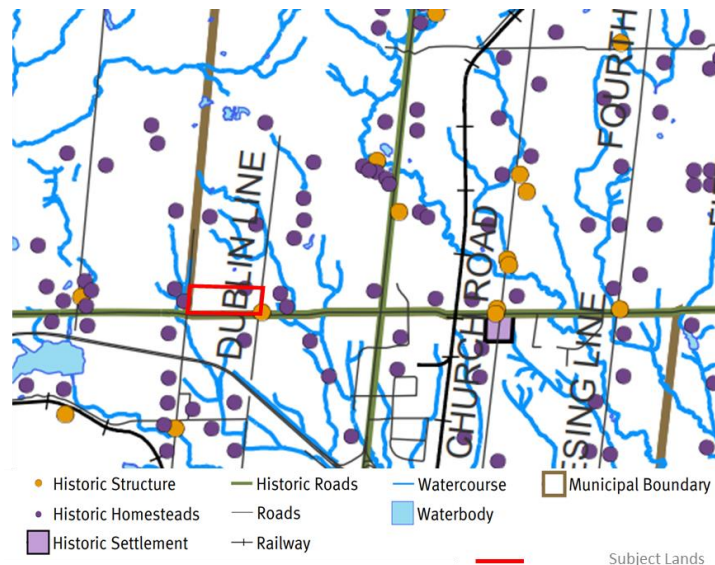


Figure 4: Master Plan of Archaeological Resources of The Regional Municipality of Halton

Our planning opinion, inclusion of Subject Land into Future Employment Area would not negatively impact Environmental policy of the region as the Subject Land is not within Mineral Aggregation Resource Plan Area, Source Protection Plan Area and does not include key natural heritage features.

NHE Result Summary

Natural Heritage Due Diligence Screening report conducted by LGL Limited on August 2021 approved that the main natural feature on the site is the woodlot, located on the north of the property; however, an appropriate setback has been proposed to preserve the feature.

- As indicated on NHE study (see Appendix 'A') despite the presence of several species at risk within the closest 1 km grid squares to the subject property, no habitat for threatened or endangered species has been identified on the Subject Lands.
- The Halton Region Source Protection Plan does not identify any 'Significant Groundwater Recharge Areas,' 'Highly Vulnerable Aquifers' or 'Wellhead Protection Areas' on the property.

CONCLUSION

- The Subject Lands have 3 frontages on Tremaine Road, Campbellville Road, and Dublin Line, and located at the intersection of two arterial roads.
- The Subject Lands are within one kilometer of the highway 401.
- The Subject Lands are not within Specialty Crop Area.
- The Subject Lands are fairly flat.
- The Subject Lands comprise small woodlot on the north.
- The Subject Lands do not comprise watercourse.
- Adjacent lands are included in Urban Expansion boundary, and Future Strategic Employment Area.
- The Subject Lands are not within Key Natural Heritage Feature Area.
- There are no livestock on the property currently or planned in the future (see Appendix 'B', attached letter of undertaking).
- No endangered species have been identified on the site.
- There are no Provincially Significant Wetlands (PSWs), Areas of Natural or Scientific Interest (ANSIs) or Environmentally Sensitive Areas (ESAs) located on the Subject Lands.
- The Halton Region Source Protection Plan does not identify any 'Significant Groundwater Recharge Areas,' 'Highly Vulnerable Aquifers' or 'Wellhead Protection Areas' on the Subject Lands.

We understand that the Subject Lands are part of the Niagara Escarpment Plan (NEP) Area and amendment to the Plan would only be possible by 2027 as part of the overall NEP review, and could only be initiated by the Minister of Natural Resources. However, we would like to bring to the attention of the staff that the Integrated Growth Plan of Halton Region horizon is for 2051, while NEP currently used for the Integrated Growth Plan is for 2027.

The base provincial document used for the urban expansion is lagging behind 20 years and if this is the case -if the region is planning for 2051, then we would request that the subject property be included in urban expansion, if not for 2031 then for 2051 unquestionably.

The Subject Lands are located at the intersection of two arterial roads; have the same official plan designation (Prime Agricultural Area) as adjacent property on the east which have been included in urban expansion boundary; is in proximity to transit corridor and highway, and even more developable than adjacent east properties; offering flat topography and no aquifer and

watercourse. In our planning opinion, this seems equitable to consider the subject lands as a candidate for the Urban Boundary Expansion exercise on account of the inconsistent policy documents.

If you have any questions or concerns, please contact the undersigned at ext. 335, or Hanieh Alyassin at ext. 337.

Yours truly,

Weston Consulting

Per:

A handwritten signature in black ink that reads "K. Pandey". The signature is written in a cursive style with a horizontal line underneath the name.

Katie Pandey, MAES, RPP
Associate

c. Justin Polce, Weston Consulting