



May 28, 2015

Land Use Planning Review
Ministry of Municipal Affairs and Housing
Ontario Growth Secretariat
777 Bay Street, Suite 425 (4th Floor)
Toronto, ON
M5G 2E5

Dear Sir/Madam:

**Re: Review of the Greenbelt
As it Relates to 11743 Steeles Avenue
Part Lot 1, Concession 6 (formerly Twp. of Esquesing)
Town of Halton Hills, Regional Municipality of Halton**

This submission is intended to provide input to the Provincial review of the Greenbelt area, and relates specifically to a property owned by our company, Great Land (Halton Hills Phase 2) Industrial Corp.

Location and Description

The municipal address of the subject property is 11743 Steeles Avenue, Town of Halton Hills, and the legal description is Part Lot 1, Concession 6, Town of Halton Hills. The property is approximately 49 acres in size, with approximately 335 metres of frontage on Steeles Avenue, and approximately 595 metres on the Sixth Line. Appendix A contains a location map, and Appendix B, a survey of the property (before recent road widening expropriations).

Local Context

The site is located in a rapidly growing area of the Province, and directly abuts the Halton Hills industrial land belt, which spans from the Town of Milton to the west, to the City of Mississauga to the east. This industrial land belt, currently located mainly between Steeles Avenue and Highway 401, includes lands north of Steeles Avenue (existing and planned) as well. This area is an important economic driver, and will continue to be even more important, to economic sustainability for the Town of Halton Hills, the Region of Halton, and to the Province of Ontario. The municipal authorities have invested 10's of

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millions of dollars to bring full urban infrastructure, including municipal sewer and water to the area.

Steeles Avenue, immediately in front of the subject lands, and west to James Snow Parkway, has been recently transformed from a rural road with ditches and no services, to a multi-lane urban major arterial road with full municipal services. Urbanization is quickly transforming the area.

As you can see in Appendix C, the property is predominantly covered by a woodlot, but the southerly 13 acres, is an open field which is farmed annually. There was a residential home on the building at the west end of the field, but that was removed from the site approximately 5 years ago.

WE ARE ASKING THE PROVINCE TO GIVE SERIOUS CONSIDERATION TO REMOVING THE SOUTHERLY 13 ACRES, BETWEEN STEELES AVE. AND THE SOUTH LIMIT OF THE WOODLOT, OUT OF THE PROVINCIAL GREEN BELT

BACKGROUND

Environmental

We are not disputing the inclusion of the 36 acres or so of woodlot on the property within the Green Belt, as notwithstanding the woodlot is not identified as significant in the planning documents present below, we recognize it contains natural features, including a creek, which flows through the middle/north part of the woodlot, from the northwest, to the east.

As you can see in Appendix D, the Regional Floodplain Limits, and Fill and Construction Regulation Limits, as determined by Conservation Halton, are well within the central part of the woodlot, well away from the southern treeline of the woodlot.

The southern field has been actively farmed for decades, and therefore this use is not a recent phenomenon.

Halton Region Planning

We have taken excerpts from the Region of Halton Official Plan to provide insight into the Regional land use planning status.

Appendix E- Map 1 – Regional Structure. The property is identified within the Greenbelt Natural Heritage System, in conformity with the Provincial Plan.

Appendix F – Map 1A – Provincial Plan Areas and Land Use Designations. The property is identified within the Greenbelt Plan Protected Countryside Area, with Natural Heritage System overlay, in conformity with the Provincial Plan.

Appendix G – Map 1C – Future Strategic Employment Area. The property sits in a small pocket of land with Urban Employment Area immediately across the road, and in close proximity to the east and west. It is better located from an access and existing municipal servicing perspective than much of the future Strategic Employment Area lands.

Appendix H – Map 1E – Agricultural System and Settlement Areas. The existing field on the subject lands is identified as a Prime Agricultural Area, but it has become a very isolated parcel, well separated from other agricultural lands, and in the midst of predominantly urban lands on three sides. There is no opportunity to make the property a viable farm due to its size limitations.

Appendix I – Map 1G – Key Features within the Greenbelt and Regional Natural Heritage System This map combines the several overlays presented previously above, whereby the property is located within the Key Features, Greenbelt Plan Boundary, Greenbelt NHS, and Prime Agricultural Lands.

Town of Halton Hills

We have taken excerpts from the Town of Halton Hills Official Plan to provide insight into the local land use planning status.

Appendix J – Schedule A1 – Land Use Plan. The property is located in the Protected Countryside Area, in conformity with the Regional Official Plan and Provincial Greenbelt.

Appendix K – Schedule A2 – Greenbelt Plan. The property is located in the Protected Countryside Area and Natural Heritage System, in conformity with the Regional Official Plan and Provincial Greenbelt

Appendix L – Schedule A8 – 401/407 Employment Area. The property is immediately across the street from existing employment lands and front directly on Steeles Avenue, which is the primary arterial road servicing the Employment Area for its entire length.

Appendix M – Schedule B1 – Functional Plan of Major Transportation Facilities. The property fronts directly on Steeles Avenue, which, as a **Major Arterial** in the hierarchy of roads, is close to the top transportation routes, and outside of Provincial Highways and Freeways.

Appendix N – Appendix A1 – Environment – Natural Areas. The Property is well away from any Provincially or Regionally Significant areas, Identified Wetlands,

Environmentally Sensitive Areas, or Areas of Natural and Scientific Interest. The woodlot on the property has been identified, but the field is plain white.

DISCUSSION

We recognize that the Province, and most municipalities in Ontario have a “no net loss” policy with respect to Greenbelt lands. As a result of the ongoing review, we also understand there is a very good chance that the Province will be adding new tracts of land into the Greenbelt. We recall that the current government intends to expand the outer edges of the Greenbelt over a six year period, as committed to in the recent election platform. In the overall picture, deleting 12 acres, is not even noticeable on a percentage basis, and the land area could easily be offset elsewhere, in more rural, unserviced, environmentally sensitive areas. In addition, the measurement of the Greenbelt lands is likely not even accurate to the nearest 100 acres, let alone 12 acres.

This brings us to the issue of precedent, as we are aware there will likely be others asking for a similar release from the Greenbelt. In our opinion, the Province has to establish a checklist of criteria whereby properties can be assessed on their own merits as to whether they truly belong in the Greenbelt. We are confident that the 13 acres on our property would meet a stringent list of requirements. Alternatively, we would support the suggestions by many municipalities, for a municipally led process through which Greenbelt boundaries can be fine tuned. The local municipality is the most familiar with their land base, and a logical choice to consider applications under guidelines prepared by the Province.

Without getting into a detailed discussion on each item, we ask the Province to consider the following important points for our 13 acres:

1. **FULLY SERVICED:** The site is fully serviced with municipal water and sewer along the entire Steeles Ave. frontage
2. **FRONTS ON MAJOR ARTERIAL ROAD:** Steeles Avenue, the road on which the property faces, is a major arterial road with nearby connections to Highway 401 and 407. It's importance as a major transportation route will continue to grow.
3. **ABUTS EXISTING EMPLOYMENT CORRIDOR:** Lands immediately to the south, and in close proximity to the east and west on the north side of Steeles Ave., are existing and planned industrial/commercial lands, that form a strong node of provincially significant employment land.
4. **MUNICIPAL FUNDS WERE SPENT TO SERVICE PROPERTY:** No additional municipal funding is required to service the lands, as pipes exist. The Region and Town have spent 10's of millions of upfront funding to bring municipal services to Steeles Avenue, and excluding the property from the Greenbelt would provide an opportunity to develop the 13 acres and collect

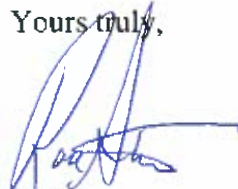
much needed Development Charges that would go to pay off the servicing debt.

5. **NOT IN HAZARD LANDS:** The 13 acres are well away from any floodplain or area regulated by Conservation Halton.
6. **NO ENVIRONMENTALLY SIGNIFICANT LANDS:** There are no Provincially or Regionally Significant areas, Identified Wetlands, Environmentally Sensitive Areas, or Areas of Natural and Scientific Interest, on or near the entire property. Only the woodlot has been identified for what it is, which is self-evident, and we are not asking for exclusion of that piece.
7. **NOT A VIABLE FARM:** The site is open farm field farmed for decades, however the limited size makes it unviable as a self sustaining farm.

We strongly believe the exclusion of the 12 acres could be turned into a win-win situation including the Province and the local municipalities. We respectfully request the Province to liaise with the Town and Region on our property, and we would be happy to arrange a meeting with the Town, Region and Provincial staff to discuss it further and work out a solution that works for all parties.

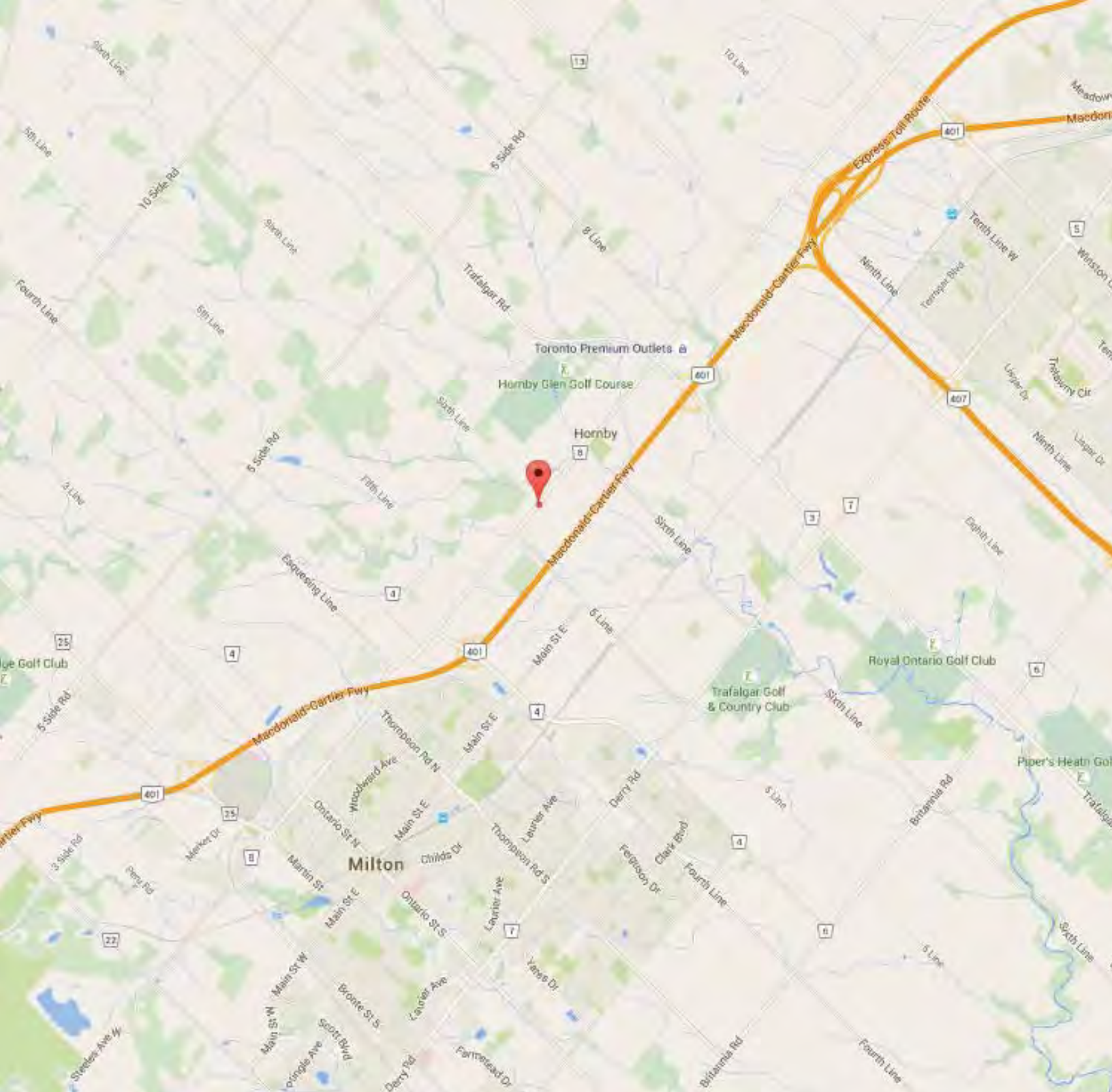
Please contact the undersigned at ronstein@greatlandscorp.com or 416-892-1578, to discuss the matter further. Thank you for considering our request.

Yours truly,



Ron Stein
Manager

APPENDIX A

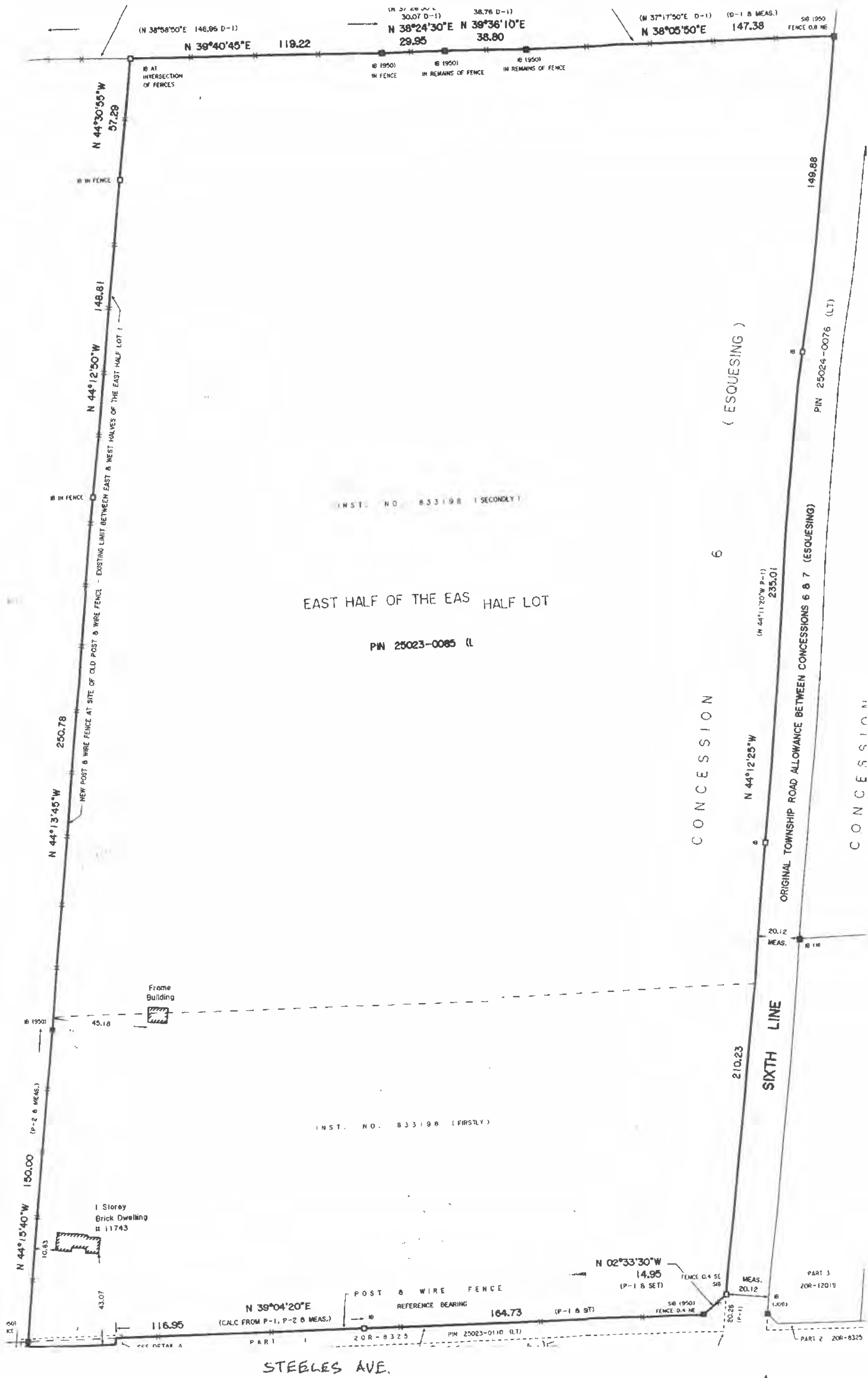


LOCATION



11743 Steeles Avenue
Town of Halton Hills

APPENDIX B



APPENDIX C

**SUBJECT
PROPERTY**
11743 Steeles Ave.

SCALE: 1:5000

APPENDIX D

**EXCERPT FROM
CONSERVATION HALTON
FLOOD RISK MAPPING
SHEET 43**

**SUBJECT
PROPERTY**
11743 Steeles Ave.

**FILL LINE
REGULATED AREA**
**REGIONAL STORM
FLOODLINE**

TREE LINE

SCALE 1:5000 ECHELLE

STEELES AVE

SIXTH LINE RD

MATCH HALTON P43

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**SUBJECT —
PROPERTY**
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APPENDIX E

Map 1
Regional Structure

Approved 2014-11-28

11743 Steeles Ave.

This map should be viewed and interpreted in conjunction with the text of the Official Plan.

* The Boundaries of the Regional Natural Heritage System may have been refined in accordance with Section 116.1.



- Waterfront Park (See Map 2)

Major Transit Station

Proposed Major Transit Station

Mobility Hub

Rail Line

Proposed Major Arterial

Major Road

Provincial Freeway

Lot and Concession Line

Municipal Boundary
- Urban Area *Approved 2013-10-21*

Hamlet

Agricultural Area

Regional Natural Heritage System *

Mineral Resource Extraction Area

North Aldershot Policy Area

Greenbelt Natural Heritage System (Overlay)
- Greenbelt Plan Protected Countryside Boundary

Niagara Escarpment Plan Boundary

Parkway Belt West Plan Boundary

Built Boundary

Employment Area *Approved 2013-10-21*

Urban Growth Centre

Area Eligible for Urban Servicing

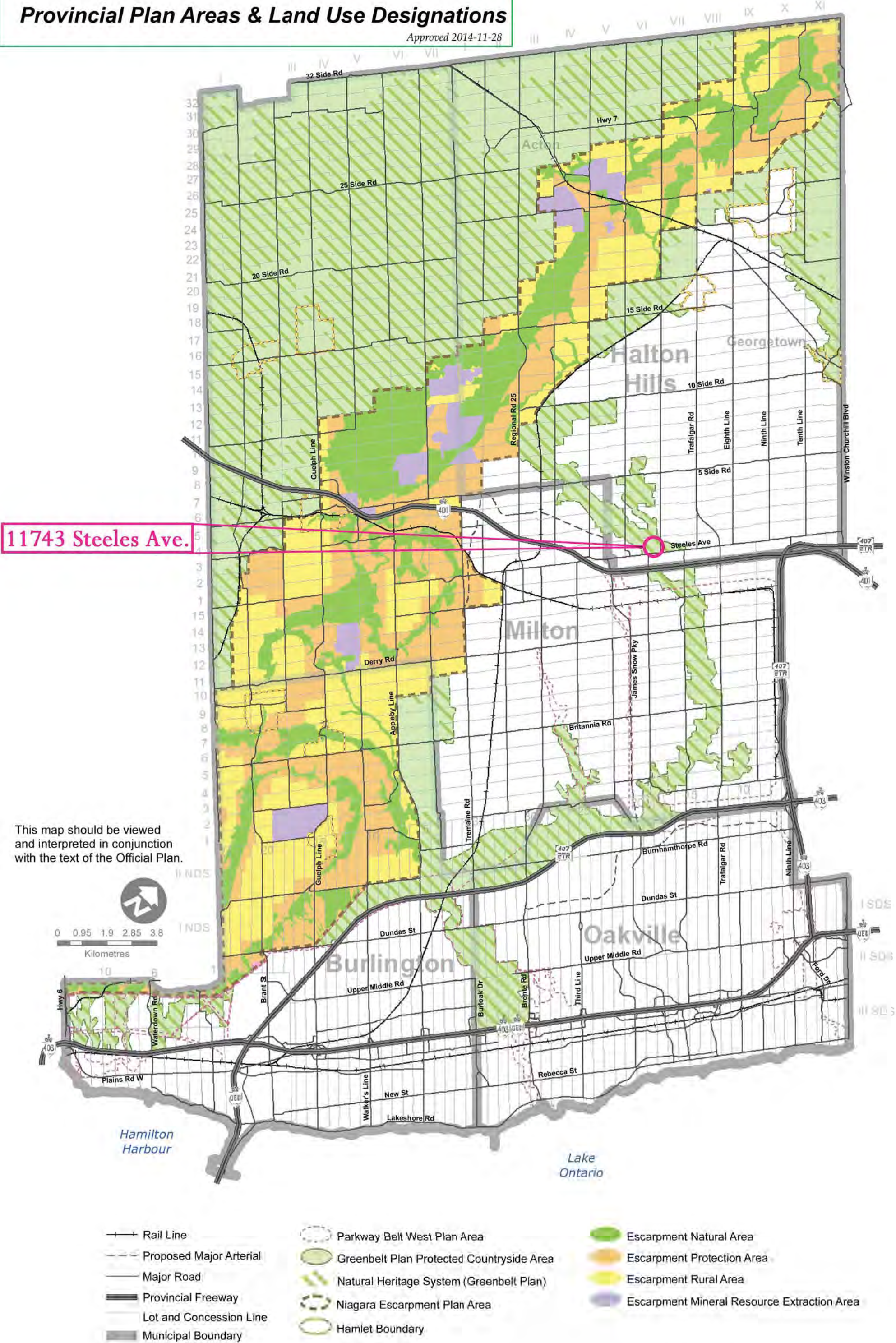
Halton Waste Management Site

APPENDIX F

Map 1A

Provincial Plan Areas & Land Use Designations

Approved 2014-11-28



APPENDIX G

Map 1C
Future Strategic Employment Areas

11743 Steeles Ave.

This map should be viewed
and interpreted in conjunction
with the text of the Official Plan.



- Rail Line

Proposed Major Arterial

Major Road

Provincial Freeway

Lot and Concession Line

Municipal Boundary

Urban Area

Hamlet

North Aldershot Policy Area

Future Strategic Employment Area

Employment Area

APPENDIX H

Map 1E Agricultural System and Settlement Areas

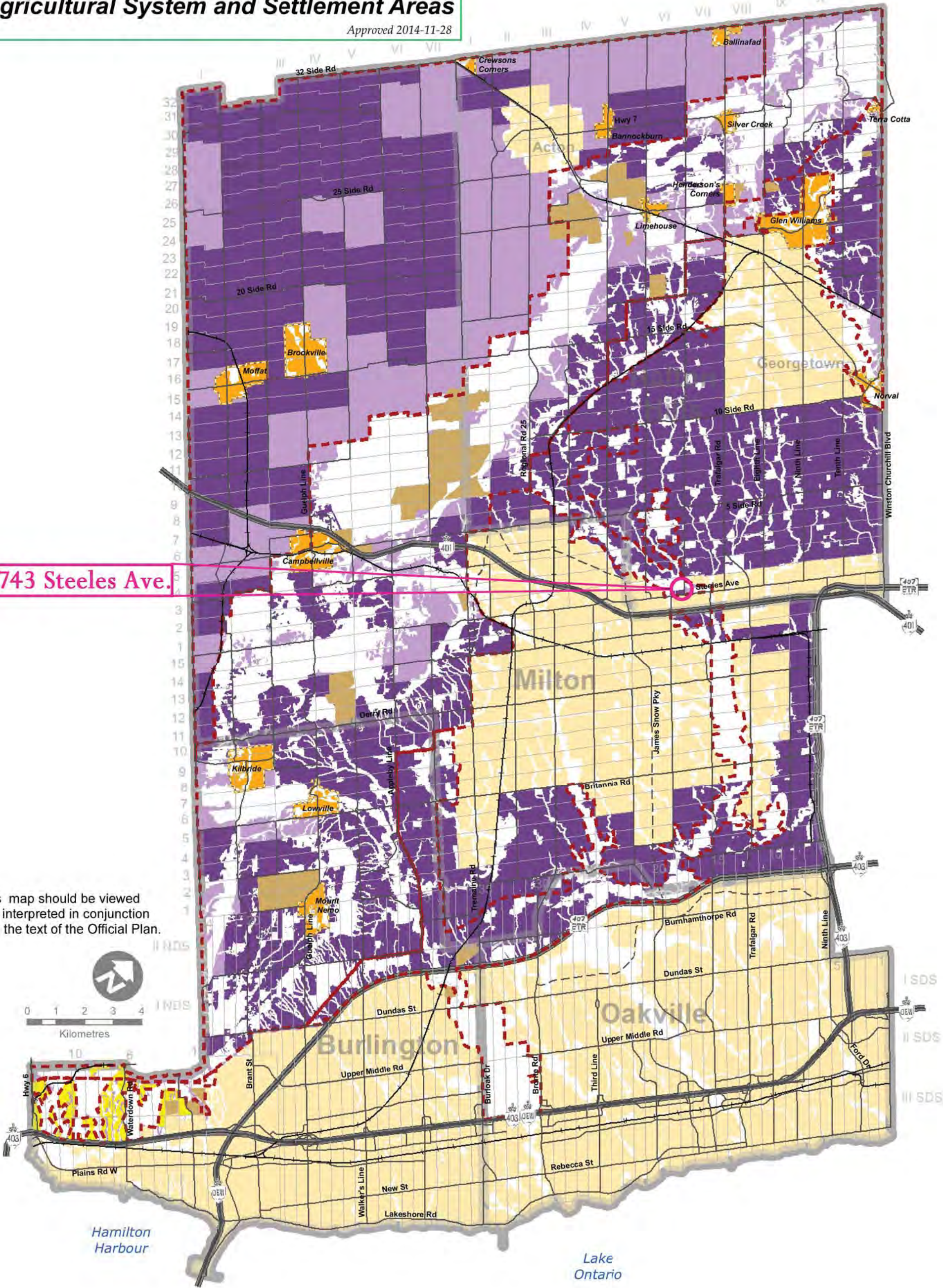
Approved 2014-11-28

11743 Steeles Ave.

This map should be viewed and interpreted in conjunction with the text of the Official Plan.



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- +— Rail Line
- - - Proposed Major Arterial
- Major Road
- Provincial Freeway
- Lot and Concession Line
- Municipal Boundary

Settlement Areas

- Urban Area
- Hamlet

Rural Clusters as defined in Local Official Plans

Agricultural System

- Prime Agricultural Areas
- Agricultural System outside Prime Agricultural Areas

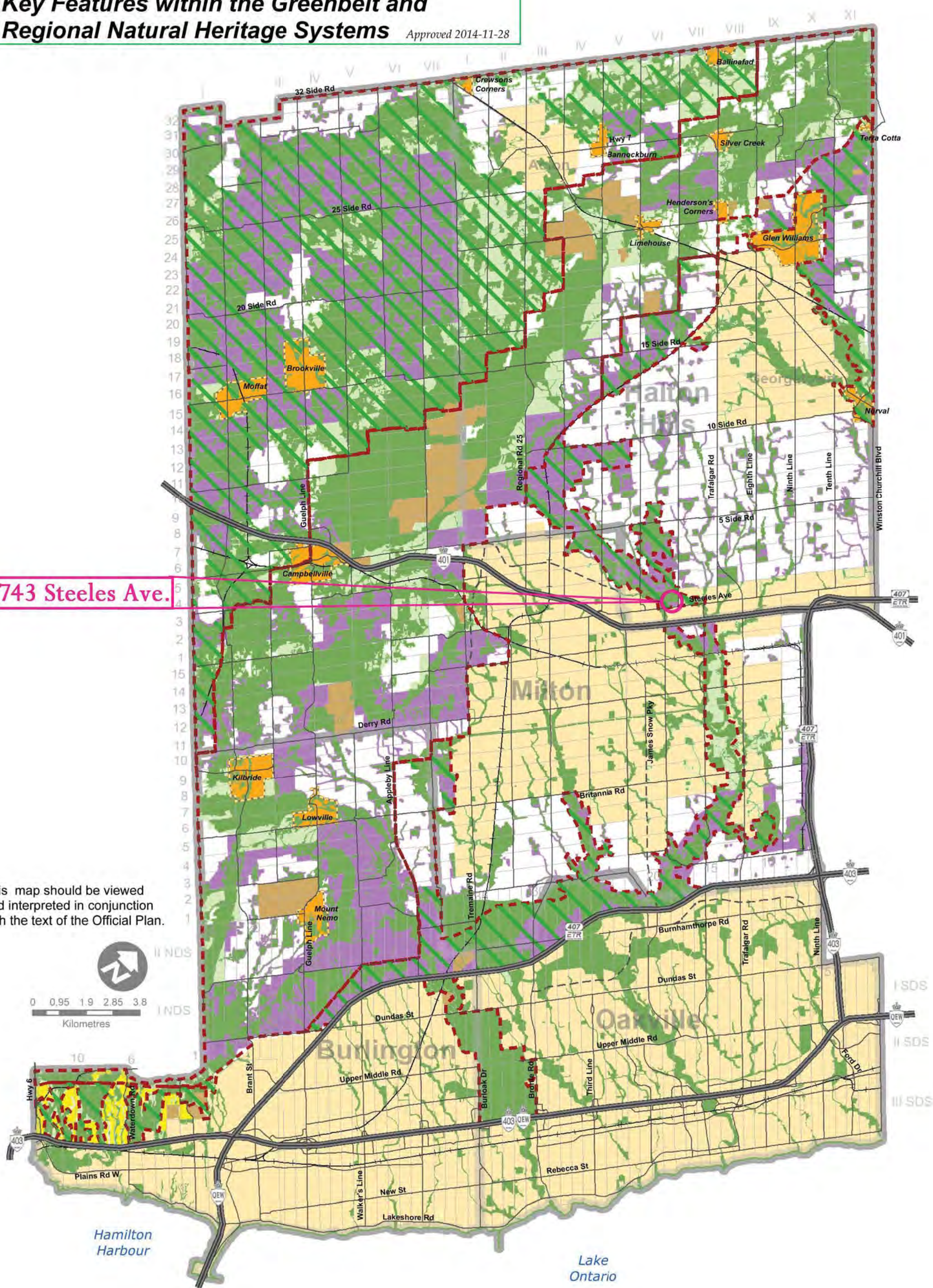
- Mineral Resource Extraction Area
- North Aldershot Policy Area
- Greenbelt Plan Boundary

APPENDIX I

Approved 2014-11-28

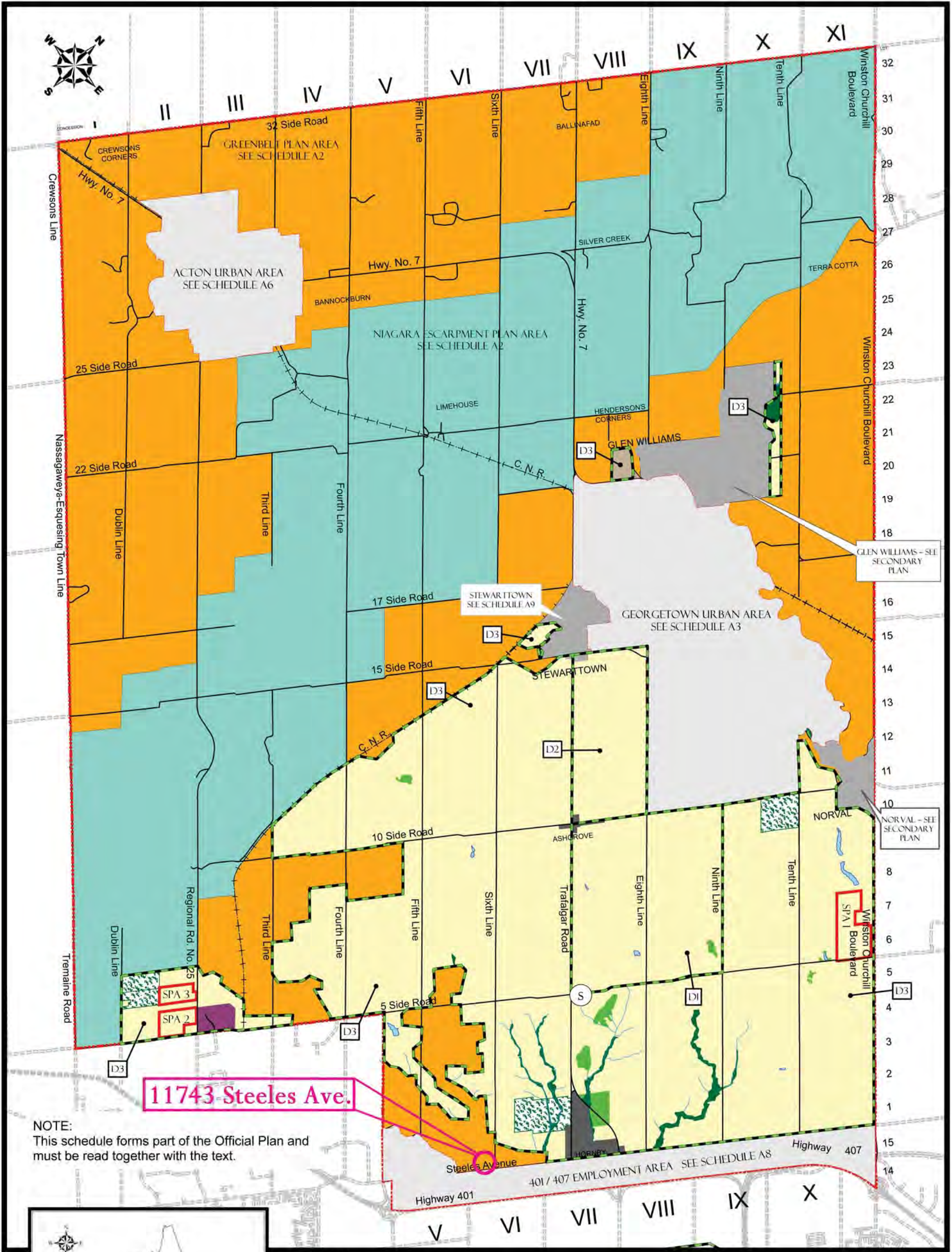


This map should be viewed and interpreted in conjunction with the text of the Official Plan.



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|---|-------------------------|---|--|---|--|
|  | Rail Line |  | Urban Area |  | Mineral Resource Extraction Area |
|  | Proposed Major Arterial |  | Hamlet |  | North Aldershot Policy Area |
|  | Major Road |  | Key Features |  | Greenbelt Plan Boundary |
|  | Provincial Freeway |  | Enhancement Areas,
Linkages and Buffers |  | Greenbelt NHS |
|  | Lot and Concession Line | | |  | Prime Agricultural Lands in NHS Enhancements/Buffers |
|  | Municipal Boundary | | | | |

APPENDIX J



LEGEND		
ENVIRONMENT & OPEN SPACE	OTHER AREAS	GREENBELT PLAN AREA - SEE SCHEDULE A2
GREENLANDS A	MAJOR INSTITUTIONAL AREA	PROTECTED COUNTRYSIDE AREA
GREENLANDS B	RURAL INDUSTRIAL AREA	NIAGARA ESCARPMENT PLAN AREA
PRIVATE OPEN SPACE	URBAN AREA	SCHOOL
AGRICULTURAL AREA	HAMLET AREA	BOUNDARIES
	RURAL/CLUSTER AREA	TOWN OF HALTON HILLS BOUNDARY
		DEFERRALS
		SPECIAL POLICY AREA

APPENDIX K

APPENDIX L



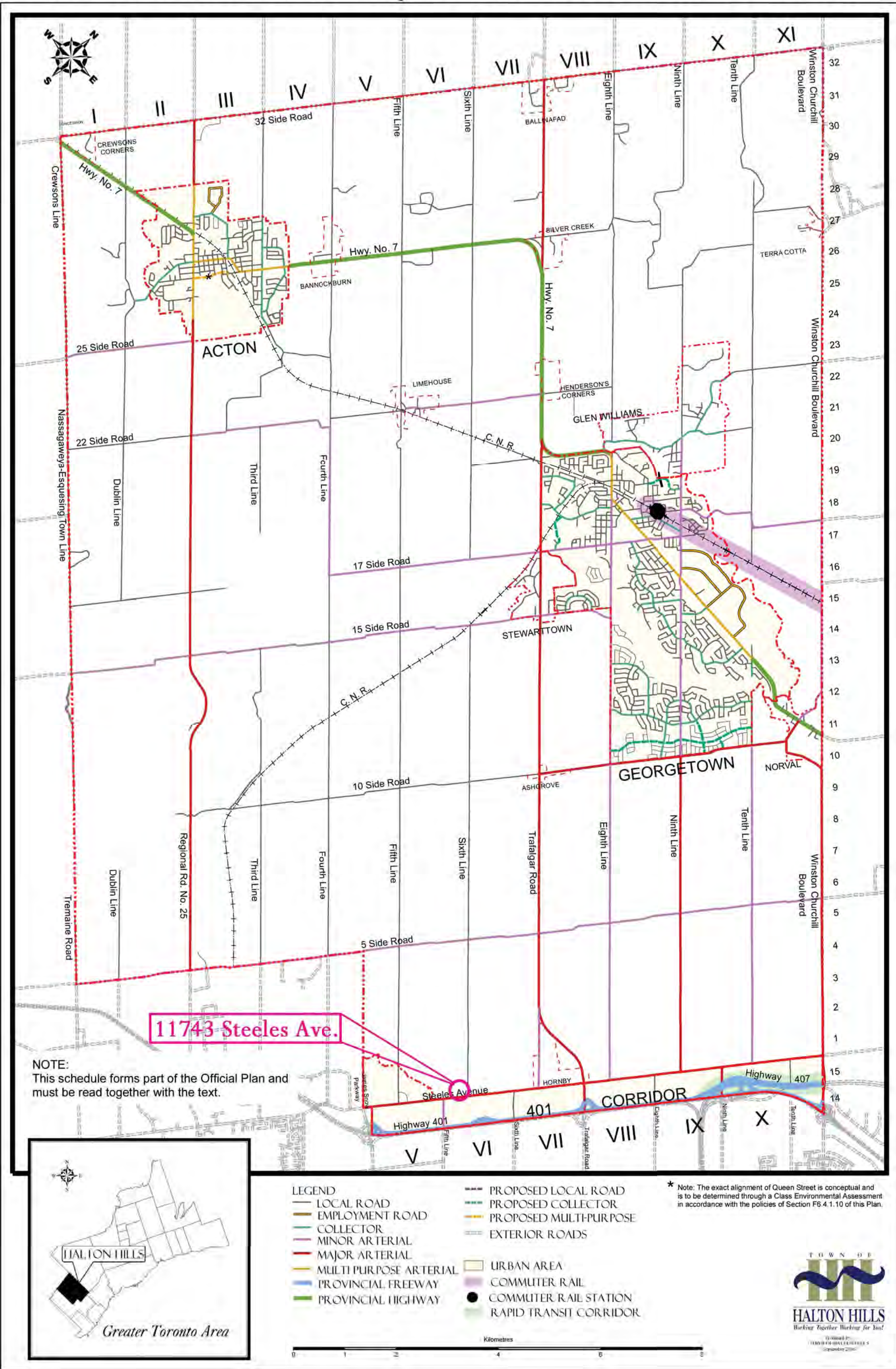
NOTE:
This schedule forms part of the Official Plan and
must be read together with the text.

LEGEND

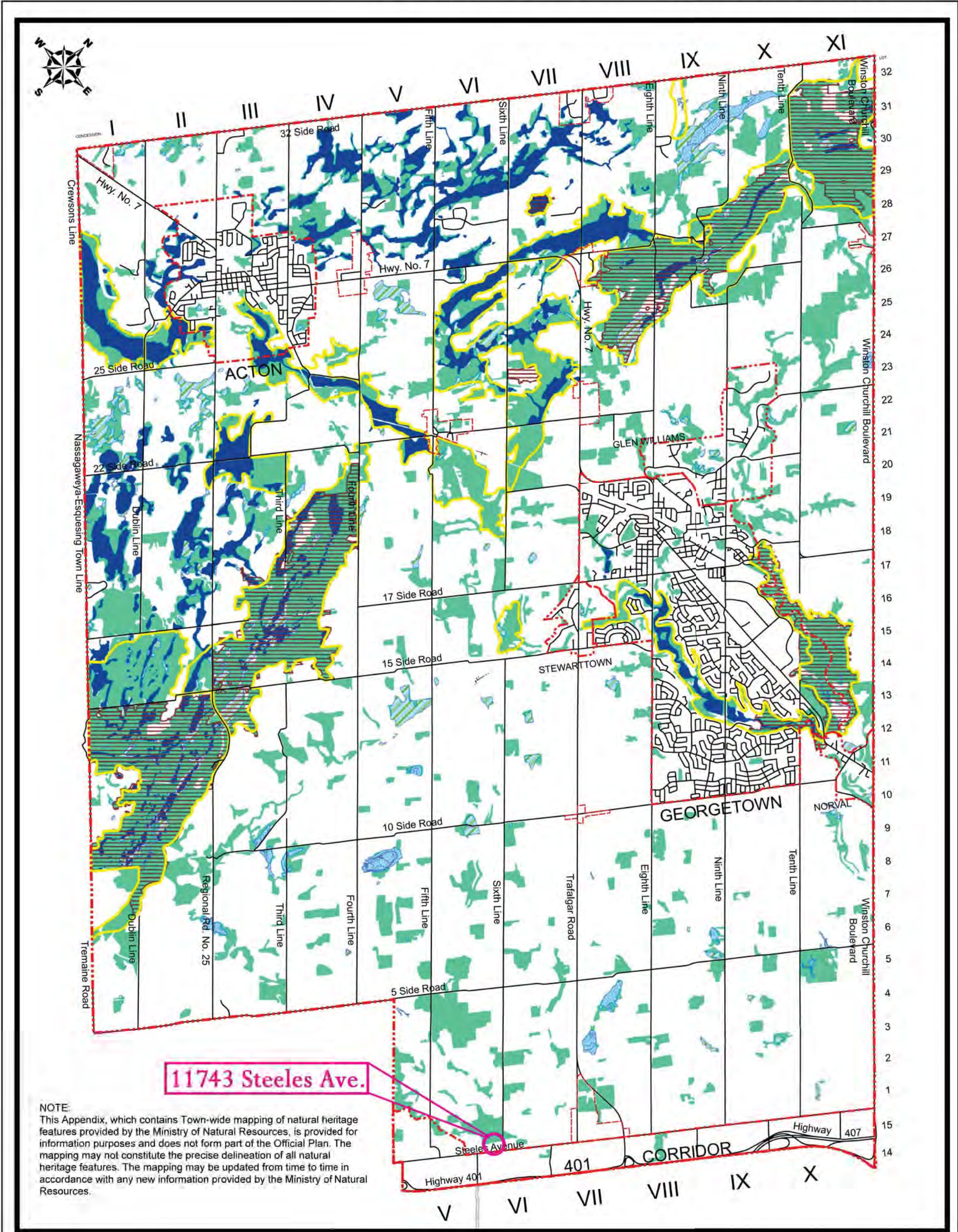
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| EMPLOYMENT AREA | ENVIRONMENT & OPEN SPACE | SPECIAL POLICY AREA |
| GATEWAY | GREENLANDS | URBAN BOUNDARY |
| PRESTIGE INDUSTRIAL | MAJOR PARKS & OPEN SPACE | TOWN OF HALTON HILLS BOUNDARY |
| SECOND PHASE OF DEVELOPMENT IN 401/407 EMPLOYMENT AREA | PRIVATE OPEN SPACE | |
| | COMMUNITY PARK | |
| | STORMWATER MANAGEMENT POND | |
| | POTENTIALLY UNSTABLE SLOPE | |
| | BUILDING WITH HISTORIC SIGNIFICANCE | |



APPENDIX M



APPENDIX N



LEGEND

EVALUATED WETLANDS

- PROvincially SIGNIFICANT
- REGIONALLY SIGNIFICANT

IDENTIFIED WETLANDS

- WOODLANDS 0.5 HA OR LARGER

ENVIRONMENTALLY SENSITIVE AREAS

- AREAS OF NATURAL AND SCIENTIFIC INTEREST

- RURAL CLUSTER BOUNDARY
- HAMLET BOUNDARY
- URBAN BOUNDARY
- MUNICIPAL BOUNDARY



SOURCE:
WETLANDS, AREAS OF NATURAL AND SCIENTIFIC INTEREST (2005)
AND WOODLANDS (2003) DATA UNDER LICENSE WITH THE ONTARIO
MINISTRY OF NATURAL RESOURCES @ QUEEN'S PRINTER FOR ONTARIO



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