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February 27, 2012

Ms. Andrea Smith  
Planning & Building Department  
City of Burlington  
426 Brant Street, Box 5013  
Burlington ON L7R 3Z6

Dear Ms. Smith:

**Re: Proposed Draft Plan of Subdivision, Official Plan Amendment and Zoning Bylaw Amendment  
Part of Lots 7, 8, and 9, Concession II EF and Part of the Unopened Road Allowance between Lots 7 and 8  
(Paletta Lands)  
Part of Lot 7, Concession I EF (Taylor Lands)  
Files 505-12/04, 510-06/04, 520-23/04, 24T-04006/B (Paletta Lands)  
Files 505-13/04, 520-24/04, 510-07/04, 024Y-04007/B (Taylor Lands)**

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Halton Region has received the above noted applications and offers the following **PRELIMINARY** comments. The comments are preliminary as the reports filed require further updates and addendums. The comments assess the proposal as set out in the 2010 amended applications:

**Proposal:**

The owner's draft plan (Paletta) proposes 171 single detached residential units, 20 single family condominium units and 624 cluster housing block units on existing and new municipal right-of-ways. The owner's draft plan (Taylor) proposed 31 single detached residential units and 24 cluster housing block units on existing and new municipal right-of-ways.

**Background:**

Paletta International Corporation and Mr. Ed Taylor have expressed interest in developing the subject lands for a number of years.

On October 3, 1996, OMB approval for development of the subject lands was granted, approving 409 residential units. The OMB approval established the principle of development of a defined density on the subject lands, and further confirmed that the development will be municipally serviced.

The applicants have indicated that the approved proposal is not economically viable and instead have filed new applications seeking approvals for increased densities. The 1996 draft plan approval does not have a lapsing date (owing to the nature of approvals at that time). Given the foregoing, there should be further discussion as to whether the 1996 draft plan approval should be collapsed and that file closed.

In 2004, the applicants submitted to the City several planning applications comprised of amendments to the City of Burlington Official Plan and Zoning By-law, along with draft plans of subdivision. The proposal sought approval for 665 residential units. The applications were subsequently appealed to the OMB. Halton Region did not provide comments on the proposal for 665 units as the appropriate supporting information and studies were not provided for review.

In 2010, the applicants amended the applications to include additional units, totalling, 870 (815 units on the Paletta lands and 55 units on the Taylor lands). This is a substantial amendment (200+ units) to the 2004 applications.

The applicant has submitted the following reports:

- Planning Justification Report (July 2002)
- Planning Justification and Environmental Analysis (January 2007)
- Functional Servicing and Stormwater Management Report (June 2010)
- Environmental Impact Assessment (December 2010)
- Erosion Assessment Report (May 2010)

Halton Region has assessed the 2010 proposal on the basis of the planning framework as of 2010.

Staff note that the 2010 proposal is based, for the most part, on the development limits which were previously approved by the Ontario Municipal Board in 1996, (development limits often referred to as "development pods" or simply "pods"). However, the development pods need to be refined within the limits of those development pods to conform with current science and practice with respect to natural heritage features, servicing, standards, etc. Additionally, much of the documentation draws comparisons with, and utilizes decisions from, the proposal previously approved in 1996, which is not appropriate given the current applications are separate and distinct from the previous approval; the passage of time; and the changed policy framework.

#### **POLICY DOCUMENTS:**

##### **General:**

Halton Region has provided a brief summary of potential areas for consideration:

##### **Provincial Policy Statement (2005):**

Regional staff has determined the following sections, among others **may be considered** in the evaluation of the application:

- Developing Strong Communities
- Housing
- Infrastructure
- Agricultural Policies
- Water Quality and Quantity
- Cultural Heritage and Archaeological Resources
- Natural Hazards
- Human Made Hazards.

As many of the studies and/or information are out of date, insufficient (studies and documentation with respect to natural heritage/hazards, servicing information for the subject lands) or has not been provided (archaeological investigations, investigations into human made hazards), Halton Region is not in a position to provide detailed comments on compliance with the above noted sections of the PPS.

**In addition to the PPS and the Region's Official Plan being considered during the evaluation, the following additional documents may be considered in the Region's review to assist in determining whether the proposal amounts to good planning which has taken current science into consideration.**

- **Growth Plan 2006:**

The Growth Plan provides a framework for implementing the Province's vision for building stronger, prosperous communities by better managing growth. The Plan directs growth to build up areas through intensification where development proposals can efficiently use existing transportation and servicing infrastructure. The Growth Plan also looks to direct intensification to specific areas and such Urban Growth Centres, intensification corridors, major transit station areas, brownfield sites and greyfields. The Plan also has policies respecting infrastructure and natural heritage systems.

The reports filed do not meet the Growth Plan definition for intensification. Furthermore, the reports do not adequately assess compliance with the Growth Plan nor do they demonstrate that the subject lands are appropriate candidates for intensification.

- **Greenbelt Plan (2005):**

The information provided within the submitted studies/reports is insufficient to evaluate the proposal with respect to the Greenbelt Plan (2005) and the relevant environmental concerns. The Region requires additional information in this regard.

**Halton Region's Official Plan:**

The subject lands contain the designations North Aldershot Policy Area and Greenlands A and B and are further identified as being Areas Eligible for Urban Services.

Policy 137 of the Regional Plan states that the objectives of the Norther Aldershot Policy Area are as follows:

- (1) *to recognize and maintain the distinct and unique character of the North Aldershot area within the context of the surrounding built up area; and,*
- (2) *to provide limited amount of development in certain locations while preserving significant natural areas and maintaining the predominately rural and open space character of the landscape,*

Policy 138 of the Regional Plan speaks to permitted uses. Single detached dwellings on existing lots are permitted, however, development must be in accordance with the planning framework set out in the North Aldershot Inter Agency Review Final Report (May 1994). The applications must be reviewed against the NAIR report with the appropriate supporting information. This is discussed in further detail below.

*With respect to servicing, Policy 139(3) states the following:*

*Permit the extension of urban services to those locations within the North Aldershot Policy Area shown as 'Eligible for Urban Services' on Map 1 provided that:*

- (a) a feasibility study has been prepared to the satisfaction of the Region;*
- (b) Regional Council deems it prudent to extend services;*
- (c) the landowner/developer has met the financial obligations as specified by the Region; and,*
- (d) sufficient servicing capacity is available as determined by the Region*

Development within greenlands and natural areas designations require the submission of an Environmental Impact Assessment (EIA). As previously noted, the applicant has submitted an EIA, however, an update/revisions to this document are required.

The applicant is also requested to provide the Region with a Site Screening Questionnaire and Phase 1 Archaeological Assessment and any associated documents which may be required upon review of those documents, to adequately address any archaeological or contamination concerns.

**NAIR:**

In 1994, a secondary planning study was conducted to address planning issues in the area of North Aldershot, which resulted in the North Aldershot Interagency Review. The result of the process was a final report that present planning principles and evaluation criteria, a character plan, land use designations and design guidelines for the area. The NAIR principles were incorporated into Halton Region's Official Plan through ROPA #2 (which are set out as policies 137 to 139 in the Regional Plan).

The land use concept for NAIR notes the following:

*North Aldershot should remain a distinct, identifiable area defined by its special characteristics including the Escarpment, topography, habitat, vegetation, creeks, valleys and ravines, and settlement patterns. There should continue to be a diversity of uses, activities and users. Therefore, while change should be permitted, it must regard and respect the area's existing character.*

The NAIR report established planning principles which represent the central objectives to guide the future of planning for North Aldershot. The five (5) principles are elaborated upon by Evaluation Criteria which provide a context for preparing the land use concept and represent the conditions under which planning policy will be prepared and proposals for development will be evaluated. The NAIR report confirms, however, that the Evaluation Criteria are not to be considered in isolation of, or to take precedent over the regulations and policies administered by various agencies of the government (Provincial Ministries, Conservation Authorities, etc.).

To this end, the Region notes that there are a number of outstanding issues related to applying agency and government regulations and policies, noted by Conservation Halton in their July 11, 2011 letter, some of which, being:

- Issues with respect to identification of the limits of natural hazard features and their associated allowances that are regulated such as Regional Storm floodplains, stable top of bank staking, meanderbelt widths, wetland limits, flooding and erosion hazards, and associated impacts to lots and road realignments etc.
- Creation of lots within CH regulated area
- Status of watercourses and determination of whether they are confined or unconfined
- Regulated habitat with respect to the Endangered Species Act

As such, at this time Regional staff are unable to provide support for the application, as the outstanding issues have a overriding impact on whether the proposal meets the objectives and evaluation criteria of the North Aldershot Inter Agency Review.

Regional staff strongly encourage the applicant to work and cooperate with the City of Burlington, Region of Halton and other technical agencies involved in the review of the development proposal to resolve the issues so that a proposal which respects NAIR can be achieved.

- **Sustainable Halton (ROPA 38):**

On December 16, 2009, Regional Council adopted ROPA 38 which has received Ministerial approval, however, is the subject of various appeals which have yet to be concluded. ROPA 38 designates the subject lands as Regional Natural Heritage System and North Aldershot Policy Area, further identified as Area Eligible for Urban Servicing .

**CIRCULATION COMMENTS:**

**Servicing – John Kisneris, Development Project Manager:**

The owner's draft plan (Paletta) proposes 171 single detached residential units, 20 single family condominium units and 624 cluster housing block units on existing, new and municipal right-of-ways. The owner's draft plan (Taylor) proposed 31 single detached residential units and 24 cluster housing block units on existing, new and municipal right-of-ways.

There is a 250mm diameter watermain on Waterdown Road adjacent to the proposed subdivision. There is a 150mm diameter watermain on Flatt Road adjacent to the proposed subdivision. There is no watermain on Flatt Road Extension. There is a 150mm diameter watermain on Ireson Road adjacent to the proposed subdivision. There is no watermain on Horning Road. There is a 150mm diameter watermain on Craven Avenue. There is a 150mm diameter watermain on a small portion of Nevarc Drive. There is a 300mm diameter watermain on the southerly portion of Panin Road.

There is a 300mm diameter wastewater main on Waterdown Road at Craven Avenue, just south and east of the proposed subdivision. The proposed development does not abut a Regional Road.

The Region has reviewed the Functional Servicing Report for the above noted plans of subdivision and has the following comments:

1. The Functional Servicing Report should state the number of units approved by the Ontario Municipal Board in 1996 (being 409 units).
2. The Report, Section 7.1, should be revised to read, "The South Halton Water and Wastewater Master Plan Update June 2008 and the Sustainable Halton Water and Wastewater Master Plan (30 day review period completed November 14, 2011) includes the water and wastewater servicing for the areas of North Aldershot that is approved for urban servicing". "The implementation of the Master Plan preferred servicing strategy will ensure that adequate water and wastewater treatment capacity is available for development on the Eagle Heights and Taylor properties".
3. The Report, Section 7.2, should be revised to read, "In 2010 the area of Panin Road and a few properties on Waterdown Road north of Highway 403 were incorporated into the zone 2 water pressure zone of Burlington". The developer's engineering consultant should revise their plans to show the new section of 300mm watermain on Waterdown Road and the interconnections across Waterdown Road to the east side. The watermain distribution drawing should be revised to show the 100mm system water meter that is located in a water chamber approximately 190 metres north of Horning Road. The water meter is located on a 100 mm diameter watermain by-pass off the 250mm watermain on Waterdown Road.
4. Page 42. There is currently no PRV reducing pressures on Flatt Road. Hydrant readings on Flatt Road identify static pressures of 160 psi. A pressure reducing valve exists south of the existing Waterdown Road reservoir for a small area of homes located south of the reservoir and north of the North Service Road.
5. Page 43. Suggested zone contours to maintain static pressures between 45 and 100 psi are as follows:
  - Zone 2, Ground Elevations 97.5 - 134.3
  - Zone 3, Ground Elevations 132.9 - 169.6
  - Zone 4, Ground Elevations 165.8 - 202.3
6. Page 43. Section 7.4 indicates major facilities for Zone 2 are in place. It should be noted that in addition, Halton is proposing to construct Zone 2 pumps at the Waterdown Road Reservoir as part of North Aldershot servicing.

7. Page 44. Option C is not the system proposed in the 2008 Master Plan. The 2008 Master Plan identifies a Zone 3 reservoir and pumping for Zones 2, 3 & 5 at the Waterdown Road Reservoir. Zone 4 would be fed from Zone 5 via PRVs. A connection would be maintained to the Hamilton water supply for emergency purposes.
8. Page 45. Converting the existing Waterdown Road watermain to Zone 4 would deal with servicing this subdivision, but would leave Halton without the ability to service lands in Zone 5 (above 202.3 metres). It would be better for Halton to continue to pump to Zone 5 and feed Zone 4 via a PRV.
9. Page 45. Since Halton is only able to negotiate for Hamilton water ten years at a time, provision must be made in this report for a "Halton only" solution.
10. The Region notes that the requirements of the Class Environmental Assessment for the reservoir, including determination of its locations and type have not been satisfied through the Sustainable Halton Water and Wastewater Master Plan. The FSR and other documentation provided by your client and its consultant will provide a useful input to the Region's Class EA Study for the reservoir to be carried out in the future. In particular, information regarding the mature state of the service area noted in the FSR would need to be finalized in the FSR. Through the future Class Environmental Assessment study, detailed feedback from applicable review agencies and key stakeholders will be required to determine what is acceptable as the preferred reservoir location and type. Halton Region is already aware that the Niagara Escarpment Commission has specific concerns regarding an elevated water tower.
11. The servicing report should incorporate lands external to Eagle Heights/Taylor properties as these developments may have impacts on the servicing of lands external to the proposed subdivisions.
12. Hydraulic modeling for the water system should be included as part of the Functional Servicing Report.
13. Within Section 7.5 of the Report, the owner should be advised that no local watermain or water service connections will not be permitted to come off of the 400 mm reservoir watermain feed.
14. The Servicing Report should mention of Halton's Master Plan water capital projects for this area, which will include:
  - ID 3698, Waterdown Road Pump Station Expansion (Zones 2, 3 & 5), \$5.625M
  - ID 3699, North Aldershot Reservoir (Zone 3), \$5.072 M
  - ID 3700, 400 mm WM from Waterdown Road Pump Station to North Aldershot Reservoir, \$2.279M
  - ID 5881, 400 mm WM on North Service Road from King Road to Waterdown Pump Station (Zone 2), \$6.589M
  - Please note that these costs are preliminary and subject to change with approval of the Sustainable Halton Master Plan and Development Charges Technical Report.

Options for providing a second feed to Street A should be reviewed in order to eliminate the long dead end.

15. Allowance should be made within the Taylor draft plan of subdivision for a future watermain from Street X to future development properties to the west. This is for the purposes of watermain looping or sanitary servicing should it be required. Possibly it may be accomplished with a servicing easement through Block F. Some further review should be done by the developer's consultant to confirm that this is possible.
16. Based on tributary areas and population figures indicated on sanitary drainage areas plan (Fig.7.2), the overall arithmetic calculations in the design sheet seem to be okay, except for some errors in the total population column. The errors have given rise to an overestimation of the overall total population by 75 persons which, in turn, overestimates the total peak flow by 1.2 L/s (negligible).
17. At the bottom of the twin columns on the design sheet for residential units, the total of the Single Family Housing Units is 484 (88 units existing and 376 proposed), while that of the Cluster Housing Units is 648. The subdivision

phasing plan (Fig.2.3), on the other hand, gives these totals to be 202 and 648, respectively. The total of the cluster housing units thus matches that obtained from the design sheet (based on Fig.7.2). However, the total of the single family housing units from this plan is lower than that from the design sheet by 174 units (376-202=174).

18. The 20 condominium units listed under phase 2 on phasing plan (Fig.2.3) does not seem to have been accounted for independently in the design sheet. However, there are 20 units listed under SF dwellings that are supposed to be from catchment area # 5. If that's so, SF dwelling population density has been used for the condo units and their tributary area has been that of the cluster units belonging to the same catchment area.
19. The non-residential population density used in the calculations is 90 persons per Hectare, which is also the same as that specified by the Region's Design Criteria. However, their population densities work out to be 15.21 persons/ha for Single Family Housing and 72.32 persons/ha for the Cluster Housing. These values are substantially lower than the values specified by the DC, which are 55 and 135, respectively.
20. Flow velocities along street B (N-O), street A (P-S), Flatt road (S-M) and Panin road (ZZ-Z) are lower than the minimum specified by the Design Criteria (0.6 m/s). It is recommended that the slope of the pipes be increased or re-evaluated in order to realize higher velocities (lower depths), improve conveyance efficiency of the sewers, and prevent sediment deposition.
21. Staff Report PPW90-08 – “Monitoring of Development within the Skyway Wastewater Treatment Plant Catchment Area” stated that the development within Skyway WWTP drainage area should be monitored closely until the expansion is completed.
22. Proposed developments such as Eagle Heights must be monitored closely until the time the plant is expanded.
23. The Skyway WWTP is currently undergoing an expansion and is anticipated to be complete in 2014.
24. Development may be considered if construction and occupancy is phased out until anticipated completion of Skyway WWTP expansion. However, sanitary sewer design sheet included in FSR from Metropolitan Consulting does not calculate or follow proposed Phasing scheme outlined in Fig. 2-3 Eagle Heights Phasing Plan. It is recommended that a sanitary sewer design sheet that matches the proposed phasing sequence be resubmitted to allow for better determination of maximum flow from the development.
25. We recommend that the sewer from Street X cross under Tributary 4 to the Bethel Church property and follow Nevarc Ave. & Craven Ave. to the existing sewer on Waterdown Road – Alt. 2B.
26. The wastewater main (and possible watermain) crossing tributary four should be located within a separate City of Burlington parcel and not an easement. This could be a walkway block from Street X to Nevarc Drive. The draft plan should be amended to show this block. The block should be of sufficient size to accommodate all the services, their separation distances, maintenance vehicle access, etc.
27. The next phase of the sanitary sewer construction should take into account all the existing homes on Craven Avenue and Nevarc Drive, and the rear of some Waterdown Road lots, to ensure the orderly development of sanitary sewers in the area.
28. Wastewater service laterals should be constructed to the existing properties on Craven Avenue, Nevarc Drive, Flatt Road and Flatt Road Extension, Horning Road and Waterdown Road.
29. We note that the Region has previously commented on temporary servicing for the church to be located on the institutional block.

30. The wastewater main on Street E should be constructed up to the Waterdown Road right-of-way in the vicinity of the south side of the institutional block, and up Waterdown Road to the north side of the institutional block.
31. The wastewater main on Street D should be constructed up Waterdown Road to the northerly limits of the development, approximately 25 metres.
32. The wastewater main on Flatt Road should be constructed to Waterdown Road, with a stub extending north outside of the intersection.
33. Halton Region development charges projects cannot proceed to the design stage are not considered funded until all the Class Environmental Assessment requirements are in place and there is an approved financial plan. The financial arrangement discussions must be initiated by the owner with the Region.
34. The Report states that the developer is proposing rural cross sections of the proposed subdivision roads. The City, under these developments, may be requesting some roads to have an urban cross section. The owner should undertake to have this worked out and then update the Report accordingly.
35. The Report would benefit by stating that some of the stormwater management controls like soakaway pits, infiltration trenches, grassed swales and rainwater gardens may have an impact on Regional servicing, and that wastewater mains or wastewater service laterals located in the vicinity of these features may require increased protection from infiltration. This will be discussed further at the detail engineering design stage.
36. The Report suggests that there may be servicing easements through valley lands. From an engineering perspective this may require construction utilizing casings and spacers. The suitability of such servicing and environmental impacts needs to be addressed.
37. Given the above information, the Report should look more closely at phasing and constructability of the two subdivisions, and revise the proposal for phasing accordingly.
38. Stormwater related to the Waterdown Road right-of-way, pre and post re-construction of Waterdown Road, should be confirmed as having all the necessary outlets for the treatment of stormwater for quality and quantity. If needed the owners shall make the appropriate allowances within their draft plans of subdivision.

Based on the above comments, the applicant is required to provide additional information and analysis with respect to servicing.

**Environmental Impact Assessment (2010, Savanta) – Mirek Sharp, North South Environmental:**

General Comments

Background

It is recognized that there is an existing approved draft plan for the property that resulted from an OMB hearing in the mid-1990s. The use of older information is supported to the extent to which it contributes to a fuller understanding of the site and its surrounding area; however the EIA requires further amendments and refinements for the reasons set out below.

Regional EIA Guidelines

The EIA should adhere to the Regional EIA Guidelines. The Guidelines have not been referred to in the Savanta EIA, and some of the requirements (e.g., refinement of ESA boundaries, and therefore Greenlands boundaries) have not been addressed. Normally, an applicant would prepare a Terms of Reference for an EIA and circulate it to the approving authority for comment, but we see no reference to one. It is strongly suggested that the applicant consult with the approving agencies to determine the appropriate content of further revisions to the EIA.



### Completeness of the EIA

An EIA that supports the current (2010) plan should be a complete and stand alone document, with complete methods, inventory, analysis of significance, impact analysis (direct and indirect), recommendations for mitigation and demonstration of conformity with relevant policies. The Introduction to the EIA indicates it is an update study and omits a lot of the data and methods from earlier studies, even though the analysis relies on it. The update approach is acceptable as long as it provides all the previous data and any older analyses that are still relevant, so the reader can evaluate the conclusions with the benefit of the supporting information and the methods used to collect the data.

### Policy Conformity

The EIA recognizes the 2010 Draft Plan as a “new application”. Therefore, the current policy in the relevant Regional and Provincial Plans, as well as policies of the Conservation Authority, need to be addressed. The information and analysis provided in this “update” EIA is not sufficient to demonstrate conformity with these policy documents, nor does the EIA fulfill the requirements of the Regional EIA guidelines.

### Field Methods

The methods used to collect field data are unclear in some cases and inappropriate in others (e.g., breeding bird surveys in August, both recent floral surveys in August). Methods from the earlier environmental reports are not provided.

### Figures

The Figures need to be provided at a scale which is readable. In addition, there is critical information that needs to be provided in the figures, including:

- an inventory figure which just shows the results of the biological inventory (ELC, location of any significant species, etc.);
- the principal features that have policy implication (e.g., woodlands, valleylands, watercourses, etc.) should be mapped separate from inventory and policy designations;
- feature boundaries shown on figures should be staked and approved by the review agencies (e.g., at present, the Region are not sure if buffers on Figure 4 are from valleylands based on approved stable top of bank or from the physical top of bank, or from the woodland edge where it is coincident with the valley edge);
- a separate figure should provide the relevant policy mapping; this should include the existing designations (ESAs, ANSIs, Greenlands A and B, etc.);
- while the Figure that overlays the proposed development on natural features is appreciated (this is often missing from EIAs), it is suggested that a constraint boundary based on features (woodland, valleylands, wetlands, etc.) be developed first, and then the development plan over-laid as to clearly identify where the proposed development avoids constraints, and where it encroaches. The encroachments can then be specifically addressed in the text with respect to why they are acceptable and the degree to which they constitute impacts (if any); and
- the stormwater figure is illegible owing to the scale and amount of information on it, and this should be provided as a larger figure.

### Species Status

The status (provincial, regional and local) of various species needs to be updated, and the appropriate references used (e.g., the Halton Natural Areas Inventory). In particular, several species recently designated as “threatened”, and thus subject to the Endangered Species Act, must be addressed.

### Delineation of Feature Boundaries

It is highly recommended that feature boundaries be delineated in the field with the review agencies, with the limits surveyed for incorporation onto Figures. This will facilitate agreement and acceptance of the actual limits of the “development pods”, which is essential for the application.

#### Significant Woodlands

We do not agree with the approach for identifying significant woodlands. The Region has developed criteria for determining significant woodlands and these should be applied to the site.

#### Ecological Connectivity

The ecological function of the site with respect to other nearby features (e.g., the Escarpment and other ESAs) has not been evaluated. This should be undertaken with recognition of the high degree of connectivity that currently exists within the local landscape.

#### Impact Analysis

As noted in the comment on the Figures, areas that are constrained by policy must be clearly mapped and overlaid with the proposed development to identify where there are direct impacts to features.

In general, the indirect impacts are not adequately addressed. The major change in lands use from rural/agricultural to urban will introduce new stresses to the local landscape that have not been addressed. Most indirect impacts are density dependant, thus the proposed increased units from the original approved draft plan can be expected to have an impact on natural features, and this is not recognized or discussed in the text.

The impact analysis frequently uses the term "effect" rather than "impact". It is not clear if "effect" is being used synonymously with "impact", or if it is intended to mean something else. Given that the impact analysis is relevant to determining policy conformity, and that the language of policy uses the term "impact", its use in the EIA should be clarified. In our opinion, most, if not all, instances where the word "effect" is used represent environmental impacts.

#### Incorporation of Recommendations from Hearing

Section 5 discusses the 1994 EIA recommendations, many of which were adopted as part of the OMB hearing. It is not clear which recommendations were adopted during the hearing, and no explanation is provided as to why all of the recommendations from the 1994 EIA were not adopted.

#### Site Visits

The Region requests that the applicants agree that the Region may have access to the site as may be required.

#### Conclusions

We are not sure what is being implied, or what the importance is, of the conclusion that "The Plans of Subdivision are very similar to the Approved Plan ..." Given the number of units has approximately doubled, and the internal road and lotting layout have changed, we do not perceive them as very similar with respect to potential impacts to the adjacent natural features.

The EIA does not conclude that the draft plan is acceptable. Specifically, it does not conclude that the potential impacts of the proposed development are acceptable with regard to existing planning policies, and only makes a statement regarding the protection of the ANSI. By stating that it is similar to the approved plan, it seems to imply that the acceptability of the earlier plan is conferred on this new 2010 plan, however it does not clearly conclude this and the supporting argument for them being similar is not convincing.

#### **Waste - Andrew Suprun, Waste Collection Customer Service Technician:**

Region waste will service once 90% completed and waste collection trucks can safely access the street for collection to commence. Collection will take place in front of the individual units curb side. Please have developer contact my self once development is ready for collection.

**Health – Nadia McLennan, Health Protection Services and Fabio Cabarcas, Community Health Services:**

The Healthy Environments Team requests that the developer must undertake a well monitoring program of neighbouring homes within 500m of the proposed development to address any off site well water quality/quantity concerns arising from the proposed development prior to the commencement of on-site construction/grading.

The developer must also decommission any existing wells on the subject property that will not be used as a potable water source in accordance with the Ontario Water Resources Act R.S.O. 1990, Chapter O.40.

Thank you for providing the Walkable and Transit Supportive Communities Section with the opportunity to review this subdivision application. To ensure walkability and active transportation, we have the following suggestion: Consider adding additional pathways and trails between residential blocks to enhance connectivity to the surrounding area and adjacent streets. To encourage walkability, streets should be designed on the basis of medium to short block lengths with a recommended maximum block perimeter that does not exceed 250 metres. Where block perimeter exceeds 250 metres, the provision of a block pedestrian linkage is suggested. Neighbourhoods built on a cul-de-sac street pattern system should connect to other roads and surrounding areas by looking for direct pathways. For instance, the proposed pathway on street E increases connectivity. Consider adding additional pathways and trails to create direct pedestrian connectivity between the streets and to the surrounding areas.

**Transportation – Matt Krusto, Transportation Services Coordinator**

Halton Region's Transportation Services Section has reviewed the above applications from a Regional perspective and has no comments.

**Finance – Katherine Fleet, Intermediate Financial Analyst, Development**

Please include the below note to the comments. This note is being added on the assumption that these sites will be on full Regional services.

NOTE: Regional development charges are payable in accordance with the applicable Regional Development Charge By-law and are required at the following stages: Subdivision Agreement Stage: Water, wastewater, and road (including any blocks intended for future development at the maximum density permitted under the applicable zoning by-law); Building Permit Issuance: All remaining Region-Wide Development Charges in effect on the date of issuance. Note: Any building permits which are additional to the maximum unit yield which is specified by the Subdivision Agreement are subject to all Regional Development Charges (including water, wastewater, and road not collected at subdivision agreement) prior to the issuance of the building permit, at the rate in effect on the date of issuance. It should be noted that a development charge agreement may be required to collect Regional development charges in advance of these two stages.

**Conclusion**

Based on the comments above, Halton Region planning staff cannot support the 2010 amended applications for 870 units as submitted. There are significant updates and supplementary information required for the Region to be able to adequately evaluate the proposal against the evaluation criteria of NAIR and the principles of good planning among other relevant documents. The applications are not supported by sufficient information addressing the natural heritage features and functions, the ability to adequately service the lands, archaeological and contamination investigations. Regional staff require additional information prior to providing additional comments or a recommendation.

Halton Region encourages the applicants to submit the requested information. Doing so will allow the Region to conduct a complete and thorough analysis of the proposal and provide a formal position on the applications.

I trust these comments are of assistance to you. Should you wish to discuss any of the contents of this letter in detail, please do not hesitate to contact me directly.

Sincerely,



**Laurielle Brooks, BES, MCIP, RPP**  
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- c. Ron Glenn, Director of Planning Services, Halton Region via email @ ron.glenn@halton.ca  
Nancy Mott- Allen, Niagara Escarpment Commission via email @ nancy.mott-allen@ontario.ca  
Margaret Charles, Conservation Halton via email @ mcharles@hrc.on.ca