

March 21, 2024

GSAI File: 220 – 004B

In Memoriam, Founding Partner:
Glen Schnarr

(Via Email)

Mayor and Members of Council
Town of Halton Hills
1 Halton Hills Drive
Halton Hills, ON L7G 5G2

**RE: Stewarttown Secondary Plan – Preferred Land Use Concept
1732216 Ontario Inc. and 2602151 Ontario Inc.
24 Mill Pond Drive & 12399 15th Sideroad, Town of Halton Hills**

Glen Schnarr and Associates Inc (GSAI) are the planning consultants to 1732216 Ontario Inc. and 2602151 Ontario Inc. (the ‘Owner’) of the lands municipally known as 24 Mill Pond Drive and 12399 15th Sideroad, in Stewarttown, in the Town of Halton Hills (the ‘Subject Lands’). On behalf of the Owner, we are pleased to be submitting this Comment Letter in relation to the ongoing Stewarttown Secondary Plan initiative.

GSAI has been participating in the Stewarttown Secondary Plan initiative (the ‘Stewarttown Initiative’) as well as various related Town initiatives. We understand that when complete, the Stewarttown initiative will culminate in a Town-initiated Official Plan Amendment to bring into force the Stewarttown Secondary Plan. The Stewarttown Secondary Plan will modify policy permissions across the Stewarttown community, including the Subject Lands.

The Subject Lands are located on the west side of Mill Pond Drive, north of 15th Sideroad. The Site, which is an assembly of two parcels, has a combined area of approximately 30.1 hectares (74.4 acres) and is currently occupied by a rural residential dwelling and accessory, detached structures. Agricultural fields and forested areas are also present. Based on the in-effect policy framework, a segment of the Subject Lands is subject to the Greenbelt Plan and is designated ‘Protected Countryside’. The Site is also designated ‘Urban Area’ and ‘Regional Natural Heritage System’ by the in-effect Halton Regional Official Plan. It is subject to a Greenbelt Natural Heritage system policy overlay as well. It is further designated ‘Future Residential/Mixed Use Area’, ‘Greenlands’, ‘Protected Countryside Area’ and ‘Greenlands B’ by the in-effect Town of Halton Hills Official Plan. By way of context, the Subject Lands were added to the Town and Regional Urban Area during the last Regional Municipal Comprehensive Review process in 2009 which culminated in Regional Official Plan Amendment 38 (‘ROPA 38’). Given this, the Subject

Lands can be understood as being within the Designated Greenfield Area, in accordance with A Place to Grow: Growth Plan for the Greater Golden Horseshoe, 2020 and the Halton Regional Official Plan.

As a Site located within the Designated Greenfield Area of the Town and based on the above-noted policy framework, the Subject Lands have recognized development potential. Additionally, the Subject Lands are located within the evolving Stewarttown community of the Town.

We have reviewed the Stewarttown Secondary Plan – Preferred Land Use Plan and Policy Direction Staff Report (Report No. PD-2024-016), dated February 5, 2024 and the Preferred Land Use Plan provided as Appendix I to this Report and offer the following comments.

The Preferred Land Use Plan (see **page 4** of this Letter) proposes a planning vision for those lands within the Stewarttown community and specifically for those lands located within the Stewarttown Secondary Plan area. It is understood that should the Preferred Land Use Plan be adopted by Town Council, it will be utilized to form the implementing policy framework for the Stewarttown Secondary Plan. Based on the Preferred Land Use Plan as contemplated, the Subject Lands are identified as being within a sub-area referred to as the Stewarttown Expansion Lands and are to be subject to Special Policy Area 3.

While we support the inclusion of the Subject Lands within the Special Policy Area 3 delineation given its recognized development potential and locational attributes, we are concerned with and object to the draft policy direction that a maximum residential density of up to 8 units per net hectare be applied to Special Policy Area 3 lands. In our opinion, the recommended density of 8 units per net hectare is unnecessarily restrictive and should be increased for the following reasons:

- The Subject Lands represent a unique opportunity for development to occur given the balance of the Stewarttown community is occupied by established homes;
- The Subject Lands are an appropriate and desirable location for residential development to occur as the Site will form a natural, logical extension of the surrounding community;
- Development of the Subject Lands for a low-rise residential development, which can provide for high-quality, ground-oriented housing forms that are compatible and complimentary to the surrounding context, will support the Provincial and Regional objectives of directing development to appropriate locations within a Town’s Urban Area;
- Preservation of a community’s established character can be achieved in various ways. There are policy tools available, for example, that can achieve this objective without unnecessarily restricting residential density permissions;
- Development of the Subject Lands will support achievement of complete community objectives;

- Development of the Subject Lands, at a sufficiently high residential density, will enable cost-effective growth to occur in a manner that best utilizes land, resources and infrastructure;
- A residential density of 8 units per net hectare will challenge the delivery of high-quality housing in the midst of a Provincial housing crisis and amid efforts by the Town of Halton Hills to achieve their annual housing quota; and,
- The recommended residential density will challenge the ability to conform to the Designated Greenfield Area density targets established by A Place to Grow (which is not less than 50 residents and jobs combined per hectare) and the Halton Regional Official Plan (which is 53 people and jobs per hectare for Halton Hills lands). It will also challenge the Regional phasing policies established by the Halton Regional Official Plan, and specifically, the delivery of low density housing units outlined in Table 2A.

For the above-noted reasons, we request that the recommended residential density permission to be assigned to Special Policy Area 3 lands be increased to be more aligned with the Designated Greenfield Area density targets established by Provincial and Regional policy.

In summary, we are concerned about the proposed policy directions outlined in Staff Report No. PD-2024-016 and the Preferred Land Use Plan. We request that modifications be made. Thank you for the opportunity to provide these comments. Our Client, the Owner, wishes to be included in the engagement for the Stewarttown Secondary Plan initiative and wishes to be informed of updates, future meetings and the ability to review and provide comments on the complete draft Stewarttown Secondary Plan prior to Council consideration.

We look forward to being involved. Please feel free to contact the undersigned if there are any questions.

Yours very truly,

GLEN SCHNARR & ASSOCIATES INC.

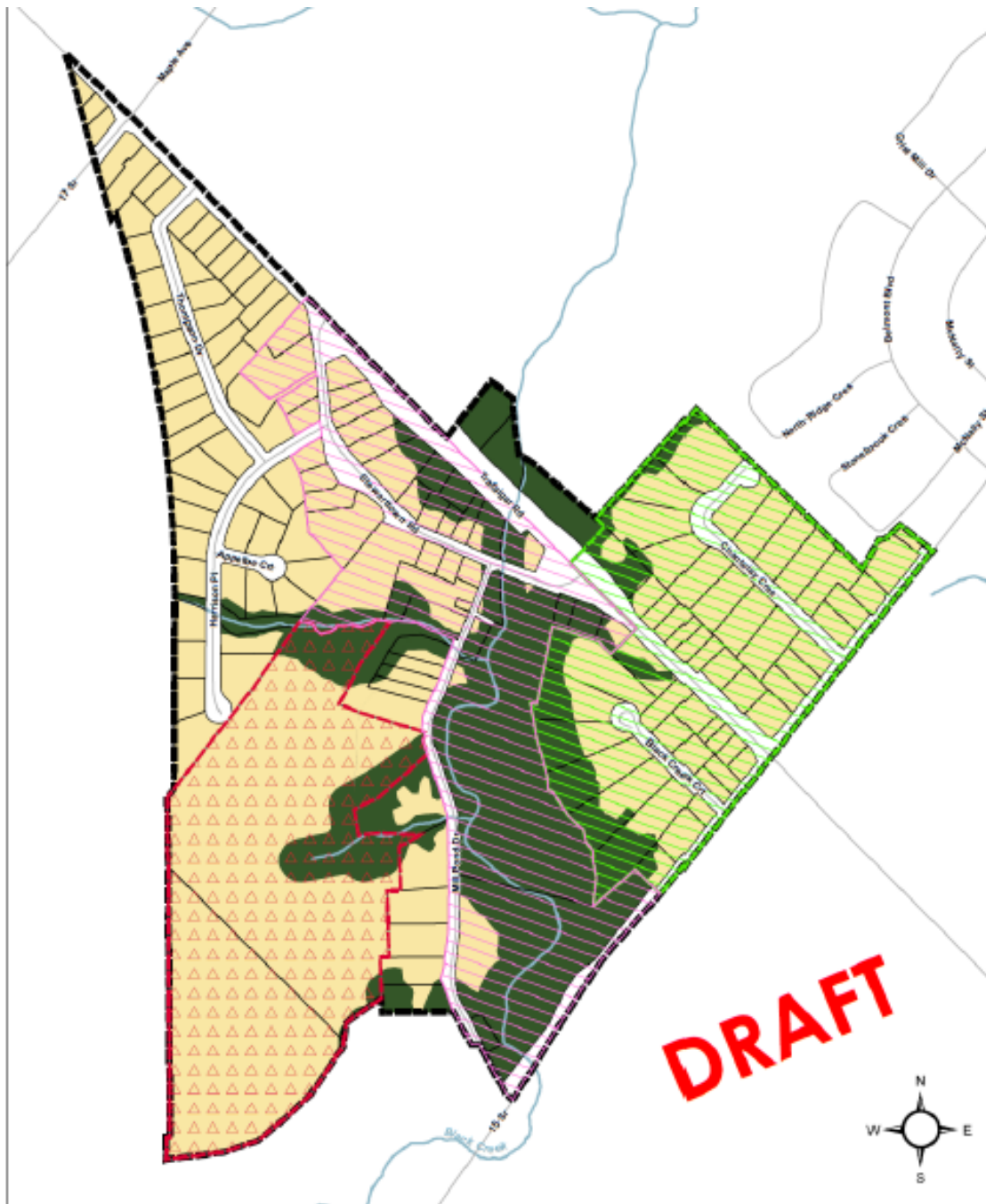


Jim Levac, MCIP, RPP
Partner



Stephanie Matveeva, MCIP, RPP
Associate

cc. Owner
Matthew Lakatos Hayward, Goodmans
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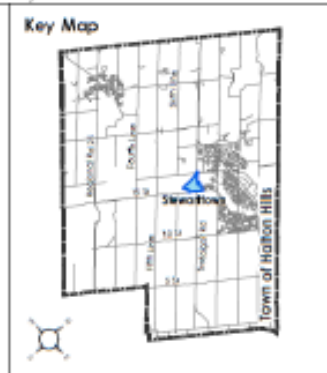


Legend

-  SP Area #1- Stewarttown South
-  SP Area #2- Core
-  SP Area #3- Expansion Lands
-  Settlement Boundary
-  Parcels
-  Roads
-  Watercourse

Land Use

-  Stewarttown Residential Area
-  Regional NHS



Schedule 'A'



Town of Halton Hills Official Plan

Stewarttown Land Use Plan

