

Appendix 4 to Report PD-2024-054

Halton Hills Staff Response to Goodmans LLP letter regarding the draft Stewarttown Secondary Plan (proposed Official Plan Amendment 57)

Letter Sent to Mayor and Council ahead of the Statutory Public Meeting, on June 13, 2024, from Matthew Lakatos-Hayward, Solicitor 1732216 Ontario Inc., and 2602151 Ontario Inc., registered owners of parcels that make up the Stewarttown expansion lands.

Key Points and Staff Responses:

Landowner's request that the expansion lands be designated Low Density Residential Area under the Town's Official Plan or that policies for Special Policy Area 3 be amended so that a maximum density can be established through site-specific policies informed by additional technical studies and a plan of subdivision.

- Town response: The Georgetown LDRA density of 20 units/ha is not considered to be in character with the surrounding Stewarttown neighborhood, which is a Residential Special Policy Area with a density cap of 5 units/ha. One intent of the Secondary Plan process was to establish policies to guide future development. Removing the recommended density of up to 8 units per hectare, as requested by the landowner, would bring into question whether the Secondary Plan achieves this intent.

That the Growth Plan requires the Town plan Designated Greenfield Areas to support a minimum density of 50 residents and jobs per hectare. This direction remains in the proposed Provincial Planning Statement.

- Town response: The Growth Plan requires that designated greenfield areas be planned at a density of 50 residents and jobs per hectare. However, the proposed Provincial Planning Statement does not include Halton Hills in the list of 'large and fast-growing municipalities' to which this policy will apply going forward, and states that densities for designated growth areas can be set based on local conditions. Lower densities for the expansion lands, and Stewarttown as a whole do not conflict with these policies given a higher density within the broader Future Residential Mixed Use Area can still be achieved through more compact development in Vision Georgetown and Southeast Georgetown.

That the addition of the expansion lands (through ROPA 38) was based on the need to accommodate a 2031 population of 94,000 people, with minimum density target for all DGAs at 39 residents and jobs/ha. ROPA 49 updated growth targets requiring the Town to plan for 132,050 people by 2051. ROP also now requires a minimum density of 53 residents and jobs per hectare.

- Town response: The Sustainable Halton exercise included the former hamlet of Stewarttown and the expansion lands in the Preferred Growth Concept. The expansion lands were included as part of this on the basis that development would be contextually appropriate, as noted in Report PDS-2009-0067. Official Plan policy D6.3.5 (Stewarttown Special Character Area) was subsequently created to provide greater certainty on this direction.

That the Town enacted Official Plan Amendment 10, which added the expansion lands to the urban boundary as part of the Future Residential/Mixed Use Area (FRMUA), at a minimum density of 55-60 residents and jobs per hectare.

- Town response: The Future Residential/Mixed Use Area (FRMUA) are a designation in the Halton Hills Official Plan (section D6.3) that is primarily intended to provide direction for the preparation of Secondary Plans. The FRMUA is made up of the Vision Georgetown, Southeast Georgetown and Stewarttown expansion lands, with a density range of 55-60 residents and jobs per hectare. As a result of detailed analysis that has carefully considered the site context, planned densities for Vision Georgetown and Southeast Georgetown are higher than this range. The Stewarttown expansion lands can therefore be planned for a lower density built form that is in keeping with the character of the existing community and takes into account the access constraints to the site.

The letter notes the proposed 8 units/ha for Special Policy Area 3 will result in a maximum yield of 88 units.

- Town response: More recent estimates on developable area puts this closer to 120 units. It should be noted that lot yield is only confirmed at the draft plan of subdivision stage.

That the expansion lands represent one of the last parcels of DGA that remain unplanned, and need to be optimized and developed as a complete community with a mixing of housing types with open space and community facilities.

- Town response: The Southeast Georgetown Secondary Plan Study Area consists of approximately 23ha of land to be used for residential and mixed uses. This area is still in the planning stages and to date a Preferred Land Use Plan has not been finalized. Preliminary concepts have shown four access points into the study area, making it more suitable for higher density development with mixed uses. It is anticipated that this area will be planned for a density comparable to Vision Georgetown.
- By way of the Getting It Done Act, 2024 (Bill 162), 434ha (net of existing infrastructure) of land immediately south of 10 Sideroad has been added to the Georgetown Urban Area for Community Area development, which includes opportunities to provide a complete community, including a mix and range of housing.

That the Town has failed to justify limiting the density in the expansion lands. The Secondary Plan relies on flawed studies reliant on notions of fit and character. Approach is not consistent with the PPS, Growth Plan or ROP.

- Town response: The direction to pursue a low-density residential concept for the expansion lands reflects Council's long standing direction dating back to the Sustainable Halton exercise (ROPA 38). The development of the expansion lands was always intended to be in keeping with the character of the surrounding Stewarttown community. The technical studies (e.g. Transportation Impact Study, Servicing Plan, and Policy Directions Report) were premised on low density residential development in the expansion lands. The intent of these studies was not to justify limiting density, but to identify the impacts of future low-density development in the area, and how it can be accommodated.

The Province has mandated that the Town deliver 9,500 new units over the next 20 years, or 792 units per year. Town's Strategic Growth Areas do not have minimum density targets and cannot accommodate all the growth required.

- Town response: The Town has sufficient land opportunities through residential intensification and redevelopment and lands that are designated and available for residential development to accommodate 9,500 units. It is important to note that the Town is responsible for granting planning and development approvals. The decision to construct individual construction projects is vested with developers.
- Land added to the Town's urban area by way of the recently enacted Getting It Done Act will provide further opportunities for residential growth to 2051 and beyond.

That Town staff are relying too much on growth in the Vision Georgetown Secondary Plan Area (412 acres with planned density of 75). When measured against entire Designated Greenfield Area this accounts for only 43.52 people and jobs per hectare.

- Town response: Vision Georgetown was always intended to accommodate the vast majority of new housing units within the Town's designated greenfield areas to the 2031 planning horizon. This argument appears to assume no development in the Southeast Georgetown Secondary Plan area. Currently Town staff are planning for that area to have a density comparable to that of Vision Georgetown (75 residents and jobs per hectare).
- As previously suggested, the density for the Vision Georgetown area is better considered in the context of Future Residential Mixed Use Area (which is made up of Vision Georgetown, Southeast Georgetown, and the Stewarttown expansion lands). Both the Vision Georgetown and Southeast Georgetown areas are currently being planned for a density greater than the required 60 residents and jobs per hectare in the Town's Official Plan.
- Vision Georgetown makes up approximately 90 per cent of the developable area across the entire FRMUA, whereas the Stewarttown expansion lands make up less than 5 per cent.
- Even with the approximately 40 developable hectares in Stewarttown and Southeast Georgetown remaining undeveloped (i.e. 0 density), the planned density for Vision Georgetown would still result in a total density for the FRMUA of approximately 69 people and jobs per hectare.

That densities should be determined through developer-submitted applications.

- Town response: Halton Hills Official Plan section G3.1 (Secondary Plans) makes multiple references to the need to establish development density through the Secondary Plan process. Specifically, section G3.1 m) requires that Secondary Plans "establish an overall development density" for the area. Town staff continue to support establishing development densities as a critical component of any Secondary Plan where community context can be appropriately evaluated and considered.