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Sent Via Email:
Attn: Clerk of the Town of Halton Hills
suzannej@haltonhills.ca

Town of Halton Hills
Attn: Mayor Rick Bonnette and Members of Town Council
1 Halton Hills Drive
Halton Hills, Ontario
L7G 5G2

Dear Mayor Bonnette and Members of Council:

**Re: Vision Georgetown Secondary Plan
Official Plan Amendment No. 32
Town of Halton Hills
Proposed Region of Halton Modifications
Our File No. 13591**

1.0 Introduction

We are writing to you on behalf of Mattamy (Halton Hills) Limited (“Mattamy”- previously 2108393 Ontario Ltd, 2108394 Ontario Ltd and Barrhaven Place Inc.). Mattamy owns approximately 120 ha (300 acres) of land situated east of Trafalgar Road, West of 8th Line and north of 10 Side Road (“Subject Lands”).

We would first like to acknowledge and thank Town staff for allowing Mattamy to actively participate in this planning exercise. As a community builder, Mattamy is excited to create neighbourhoods that will compliment an already well-planned community. It is within this context that Mattamy is supportive of many of the goals and objectives of OPA 32. However, as with any planning exercise, there remain some issues that our client has concerns with and would like to draw to Council’s attention. For the purpose of this letter we have attempted to categorize the issues under broad headings.

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TURKSTRA MAZZA ASSOCIATES, LAWYERS

In July, 2018 Council adopted Official Plan Amendment No 32 - Vision Georgetown Secondary Plan ("OPA 32") which sets out the secondary plan for an area of approximately 400 ha (1000 acre) to be developed as a complete community with a mix of housing, commercial and community uses. The Subject Lands are included within OPA 32.

Mattamy independently and through the South West Georgetown Landowners Group Inc. ("Landowners Group") actively participated throughout the preparation of OPA 32 including the sub-watershed process. This participation included involvement on the Stakeholders Advisory Committee and a submission dated May 7, 2018 for the Statutory Public Meeting.

The Region on December 20th, 2019 issued a "draft" Notice of Decision. This letter from the Region's Director of Planning has proposed a number of fundamental changes to the policies of the Town Council adopted OPA 32.

The purpose of this letter is to advise Council of Mattamy's concerns with both the Council adopted OPA 32 as well as the Region's suggested modifications. It should be noted that although we have summarized Mattamy's issues in broad headings, our client has a number of specific policy issues that we believe require attention.

2.0 Issues/Concerns with OPA 32 and Proposed Modifications by the Region of Halton

2.1 Natural Heritage System

The primary concern relates to the appropriateness, scale and location of the Natural Heritage System, including buffers, as well as the lack of flexibility in relocating drainage channels, storm water management ponds and other features. Specifically, it is our opinion that the secondary plan and the proposed modifications do not protect the natural heritage system appropriately nor do they allow for sufficient refinement through further study and analysis through subsequent applications.

We are concerned regarding the lack of flexibility in the application of the Natural Heritage System policies based on improved approaches and scientific research undertaken through the detailed application process. Specifically, Section H6.13.4.1 c) states:

"During the preparation of the EIR, the boundaries of the Natural Heritage System as illustrated in Figure 7.3.1 of the Vision Georgetown Subwatershed Study, prepared by AECOM and dated May 2017 are considered final, subject to appropriate refinements, based on more detailed information, additional surveying of features, and final buffer, corridor, linkage, enhancement and restoration area design."

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Our concern is with the incorporation of a final Natural Heritage System design (subject only to *refinements*) into the policies of OPA 32. Does this mean that storm water management ponds cannot be consolidated? Does it mean if a portion of a creek is degraded and the best solution is a relocated enhanced creek design, that this option cannot be considered as it is beyond the scope of a “refinement”? If these types of changes to the Natural Heritage System are beyond the scope of a refinement to the final Natural Heritage System mapping, then it is important to ensure that the mapping incorporated within the Subwatershed Plan and Secondary Plan is precise and is fully supported by the best technical and scientific information including best practices.

As it stands, our client cannot support aspects of the proposed mapping and related policies that deal with the NHS.

2.2 Subwatershed Plan

The Regional Official Plan contemplates the refinement of the Regional Natural Heritage System through the approval of Subwatershed Plans. OPA 32 is based on the Town’s Subwatershed Plan. Mattamy, through its team of experts, made numerous submissions associated with the Subwatershed Study principles and approaches.

Although some changes were made, the current Subwatershed Plan does not appropriately characterize existing conditions. The Subwatershed Plan proposes an environmental management system which is not efficient or appropriate and identifies features that have little if any environmental benefit. The result is constraining the land available for community building resulting in inefficient development and land use patterns, increased servicing and long-term maintenance costs and built forms which are significantly higher and different than current community standards.

In our view the net result is a plan that is not consistent with many sound planning principles including several policy directives of the Places to Grow Plan, the Provincial Policy Statement, the Region’s Official Plan as well as the Town’s Official Plan.

2.3 Buffers

Our client is particularly concerned with many of the Region of Halton modifications. Some examples include the following:

Policy H6.13.1 has been modified to indicate that the Subwatershed Plan is a “living document”. It is unclear to our client what this means. While flexibility is required for certain

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issues, referring to the Plan as a “living document” could suggest there is no certainty with the Plan at all.

Policy H6.13.3 has been modified to incorporate reports and principles not currently found in the Region’s Official Plan and that have never been subject to any type of public consultation or endorsement from Council.

3.0 Summary

As noted at the outset of this letter, through the open and consultative process with the Town most of Mattamy’s issues with OPA 32 have been addressed. Our client wishes to acknowledge the efforts of Town Staff, the consultant team and Council in this regard.

However, there remain concerns mainly with the Region of Halton modifications regarding the subwatershed study, specific environmental policies and mapping in the secondary plan. In our submission, these matters are inconsistent with policies of the Provincial Policy Statement, fail to conform with the policies of the Growth Plan and fail to conform with the Regional Official Plan and recently modified Town of Halton Hills Official Plan.

We respectfully request that Council direct staff to meet with representatives of Mattamy to discuss these issues before any further steps are taken in respect of the Region’s proposed modifications.

Thank you.

Yours truly,



Scott Snider

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