

September 18, 2020

Mr. Curt Benson, MCIP, RPP  
Director, Planning Services and Chief Planning Official  
Region of Halton  
1151 Bronte Road  
Oakville, ON  
L6M 3L1

Dear Mr. Benson:

**Re: Comments on Behalf of Hodero Holdings Ltd. and Branthaven Homes  
Region of Halton Official Plan Review  
North Aldershot Planning Area – Discussion Paper**

We are planning consultants to Hodero Holdings Ltd. and Branthaven Homes. We are writing to provide comments in response to the North Aldershot Planning Area Discussion Paper (June 2020). The lands controlled by our clients are within the Central Sector of North Aldershot as shown on *Attachment 1 – Central Sector North Aldershot Composite Plan*. They are west of Waterdown Road and south of Flatt Road and include most of the Aldershot Landscaping property and lands surplus to the Christian and Military Alliance (CAMA) retirement home.

A professional consulting team was retained to assist in the analysis of the subject lands and response to the North Aldershot Planning Area Discussion Paper. The team consists of Urbantech Consulting (Civil Engineering), CGH Transportation (Transportation Planning), and Jennifer Lawrence & Associates Inc. (Environmental Planning).

Our review of the Discussion Paper reveals fundamental concerns with the proposal to include these lands within an expanded Regional Natural Heritage System (RNHS). At meetings held between our client, Regional staff, and the Region's consultant earlier this year, our client was told that the Discussion Paper would be a background report but make no recommendations. We are disappointed that the Discussion Paper does, in fact, make recommendations that could dramatically affect the long-established planning regime and development approvals within the City of Burlington.

The Discussion Paper relies entirely on the Growth Plan Natural Heritage System (GPNHS) mapping as the basis for concluding that this area should also be included within the RNHS. We could find no science-based argument for expanding the RNHS in this discussion paper or the Natural Heritage System Discussion Paper. As you may be aware, the Region and its area planning partners (HAPP) prepared a joint submission to the Province on the draft GPHNS mapping in November of 2017. The submission noted several concerns with the Province's methodology and

end result. The HAPP Joint Submission to the Province on the proposed GPNHS mapping commented as follows:

*“The Region of Halton has already identified a NHS for Halton consisting of the Regional NHS land use designation and the Greenbelt NHS overlay. These areas were approved and in effect in the 2009 ROP as of July 1, 2017. Please revise the mapping as appropriate to ensure Key Features and Linkage Areas correspond more closely with the existing municipal Natural Heritage Systems and consider adopting Halton’s Regional NHS as the GPNHS in Halton.”*

*“The proposed mapping identifies GPNHS lands in North Aldershot beyond those shown in the Greenbelt Plan. While these lands are outside a Settlement Area, they include lands where the City’s Official Plan has indicated for many years that residential, institutional, and recreational development may be permitted. The location and intensity of future development is to be determined through further studies. The inclusion of these lands within the NHS may impose additional constraints on development.” (see Attachment 2 – HAPP Submission map)*

*The Region, in collaboration with the City and other stakeholders, is to review and update the policies for the North Aldershot area as a component of the Region’s current OP review.”*

The recommendations of the HAPP Joint Submission were endorsed by Regional Council at its meeting of November 8, 2017. Unfortunately, the Province failed to respond to the Region’s request to recognize the approved RNHS and did not amend the GPNHS mapping. **In our opinion, the ongoing Regional Official Plan Review presents an excellent opportunity to approach the Province with the objective of correcting the GPNHS mapping as recommended by HAPP and endorsed by Regional Council.**

The Discussion Paper notes that North Aldershot cannot be included within a settlement area given that most of the area is within the GPNHS. In our opinion, there is no need to include the Central Sector of North Aldershot within a settlement area as detailed planning for this area was initiated in the early 1990’s and culminated in approved policies in both the Region’s and City’s Official Plans. The City amended its Zoning By-law to implement the detailed site-specific policies of its Official Plan. **The existing zoning permits a total of 48 detached dwellings on the lands controlled by our clients.** The City has also prepared Urban Design Guidelines to help shape the form of development in North Aldershot. In our view, the failure of the Region’s Discussion Paper to acknowledge existing approvals in the Central Sector suggests that the Province intended to down designate these lands through the Growth Plan. This is not correct, and we do not think the Provincial government would accept that it intended to down designate these lands. As a housekeeping matter, the Region could elect to formally recognize the North Aldershot Central

Sector lands as “settlement area” via the current IGMS process given the existing development and servicing commitments in place.

Penta Properties Inc./Paletta International Corporation (Paletta) owns lands immediately adjacent to the subject lands (see *Attachment 1*). The Paletta holding is known as “Eagle Heights” and “Taylor Lands” comprising approximately 102 Hectares. Eagle Heights has been approved for substantial residential development in the form of infill residential, detached residential and cluster residential units. These approvals for over 400 units are reflected in Provincial Plans, the Region Official Plan, the City Official Plan, the City Zoning By-Law, and two approved Draft Plans of Subdivision. In 2002 Paletta submitted new applications, which led to the “2009 Minutes of Settlement” between Paletta and the City of Burlington. The Minutes of Settlement include provisions to further increase the approved density for a total of up to 870 residential units subject to meeting additional requirements.

### **Urban Services:**

The Region’s Official Plan (Map 1 and policy 139) identifies the Central Sector of North Aldershot as an area “**Eligible for Urban Services**”. In recognition of this policy and the existing planning permissions within the Central Sector, the Region has developed schemes that include both wastewater and water servicing solutions. The Region has completed multiple servicing studies such as the 2011 Sustainable Halton Water and Wastewater Master Plan, Sustainable Halton Water Master Plan September 2011, and the 2017 Development Charges Water/ Wastewater Technical Report. All the referenced reports have identified a servicing scheme for the Central Sector which includes both wastewater and water servicing concepts. A summary of Regional plans for servicing the Central Sector is described briefly below and a more fulsome description is provided in the enclosed “Central Sector – North Aldershot Servicing Brief” report prepared by Urbantech Engineering.

### **Wastewater Servicing:**

Wastewater servicing can be provided that is consistent with the servicing scheme identified for the North Aldershot Policy Area by the Region of Halton. The preliminary wastewater servicing strategy has considered two options to service the proposed development:

- one draining entirely by gravity; and
- one draining internally by gravity then pumped from an internal pumping station.

Both concept options build around the Region IPFS (Integrated Planning and Financial System) **Project ID 5907** that consists of:

- a 300mm trunk main connected to Waterdown Road at Craven Avenue that generally goes westward to North Aldershot and then northward to Flatt Road; and

- a 300mm trunk main along Panin Road connected to Waterdown Road at the intersection with the off-ramp from west-bound Highway 403.
- **Project ID 5907:** is accounted for in the Region's Capital Budget 2020 and is scheduled for a 2024 construction start.

### Water Servicing:

Water servicing can be provided such that the proposed development can be supplied from existing water supply infrastructure and transitioned to future infrastructure as it comes online.

According to the 2017 Development Charges Water/Wastewater Technical Report (2017) and the Sustainable Halton Water Master Plan (September 2011) this area will be moved to Halton lake-based supply when the following infrastructure is constructed:

Project #		Project Description
2011 Reference	2017 Reference	
3699	7570	4.5 ML North Aldershot in ground reservoir (Zone B3B*)
3700	7014	400 mm watermain from Waterdown Reservoir to new North Aldershot Reservoir (Zone B3B)
6602		Waterdown Reservoir expansion
6863		Waterdown PS expansion to Zones B2, B3B* & B5A

- **Project 3699/7570:** is accounted for in the Region's Capital Budget 2020 and is scheduled for a 2023 construction start.
- **Project 3700/7014:** is accounted for in the Region's Capital Budget 2020 and is scheduled for a 2025 construction start.
- **Project 6602:** is accounted for in the Region's Capital Budget 2020 and is scheduled for a 2024 construction start.
- **Project 6863:** is accounted for in the Region's Capital Budget 2020 and is scheduled for a 2023 construction start.

### Road Improvements & Transportation

The City of Burlington has developed detailed design plans to reconstruct and improve Waterdown Road and Flatt Road partially to facilitate development within the Central Sector. The construction works include widening Waterdown Road to 3 lanes with a centre turn lane in the interim and convert it to a 4-lane road in the future. Flatt Road is also proposed to be urbanized concurrent with the Waterdown Road improvements. Reconstruction of both roads is scheduled to start this year and be completed by 2024. A preliminary transportation assessment has been prepared by CGH Transportation and is enclosed with this letter.

Our clients' lands have excellent access to regional vehicle transportation facilities and are located approximately one kilometre from the Highway 403 Waterdown interchange.

The planned Waterdown Road reconstruction includes a multi-use pathway that will accommodate both cycling and pedestrian users without additional facilities needing to be planned or constructed. Local transit stops are provided at the intersection of Flatt Road and Waterdown Road as well as at Craven Avenue at Waterdown Road.

The Aldershot GO Station, which is approximately 1.5 kilometres from the site, measured from the south site access on Panin Road, includes both GO Buses and Trains, connecting to Hamilton GO Centre to the west and Union Station to the east. Due to this connectivity, this transit station is an important facility for the area, providing good commuter routes to Hamilton and Toronto, as well as destinations in between.

The proposed development will complete a planned development area, and as a result, complete the transportation network. Additionally, based on the location of the proposed accesses, this development will make good use of the planned transportation upgrades and existing transportation capacity, including the widened Waterdown Road, the new multi-use pathway, the proximity to the Aldershot GO Station, and access to Highway 403.

The proposed development of our clients' lands, along with other properties in the Central Sector, will provide the opportunity for new detached dwellings which are in limited supply within the City of Burlington. This additional supply would contribute to the mix of available residential building types and respond to market demand for detached dwellings.

For the reasons outlined above, we respectfully request that the Region maintain its existing North Aldershot policies and science-based NHS mapping as it relates to the Central Sector. We also suggest that the Region take the opportunity of the Official Plan review to work with the Province to correct the GPNHS mapping as provided for in Section 4.2.2.5 of the Growth Plan (2019).

Yours truly,

**KORSIK URBAN PLANNING**



Terry Korsik, MA, RPP

Encl. *Attachment 1 – Central Sector North Aldershot Composite Plan.*  
*Attachment 2 – HAPP Submission map on Growth Plan NHS*  
*Attachment 3 – Central Sector – North Aldershot Servicing Brief*  
*Attachment 4 – North Aldershot – Central Sector – Transportation Review*

Copy: Karyn Poad, Dan Tovey, Steve Burke – Region of Halton

Kelly Cook, Heather MacDonald, Jamie Tellier – City of Burlington

Frank Doracin - Hoderer Holdings Ltd.

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