

August 2, 2023

Provincial Land Use Plans Branch
13th Floor, 777 Bay St
Toronto, ON
M7A 2J3



Re: ERO Posting: 019-6813
Review of Proposed Policies Adapted from A Place to Grow and
Provincial Policy Statement

Jennifer Lawrence and Associates Inc. has been retained by Halton North 1 Corporation (HN1C) to provide professional planning advice related to various natural heritage policies and constraints that have been applied to and identified on 10701 Fifth Line, Town of Halton Hills (hereafter referred to as the Subject Lands). While it is understood that the current ERO Posting does not include any recommended revisions to the natural heritage system mapping that was previously prepared in support of the Growth Plan, it is important that the Province be aware that such mapping has identified a significant natural heritage system on the Subject Lands and the landowner would like to be on record raising concerns related to the this mapping.

The Subject Lands are located south of 15 Sideroad, on the east side of Fifth Line and contains two small areas designated RNHS within the current Region of Halton Official Plan (**Attachment 1**). These small areas are associated with what Conservation Halton (CH) has mapped as wetlands and the 30m buffer associated with these features (**Attachment 2**). A site visit took place with CH on August 19, 2022 to review whether the feature in the southeast corner at which time it was confirmed that this feature is not a wetland. As such, the only natural heritage feature on the Subject Lands is a small wetland (less than 0.4 ha) in the middle of an agricultural field.

Through the Region of Halton's Official Plan review process, HN1C became aware of the significant NHS associated with the Growth Plan that encompasses the eastern half of the Subject Lands (**Attachment 3**). Given the extremely limited natural heritage features within the Growth Plan NHS on this parcel, as well as parcels to the south (**Attachment 4**), it is respectfully requested that the Ministry re-examine the extent of the Growth Plan NHS in this area. The rationale for this request is outlined below.

The Growth Plan NHS in this area is a 500 m wide corridor that has somewhat arbitrarily identified a 'Y' connection that connects the northern limit of the Greenbelt Plan at 5 Sideroad to the Niagara Escarpment Plan Area just south of 15 Sideroad along the northern link of the 'Y' connection and that connects easterly to Trafalgar Road between 10 and 15 Sideroad. The connection appears arbitrary because there are limited natural heritage features within the 'Y' connection.

In response to the Province's circulation of the draft Growth Plan NHS mapping, the Region of Halton, in collaboration with their local municipal partners, prepared a report titled 'Provincial Natural Heritage System Review Implementation Procedures and Mapping, Joint Submission', prepared by the Halton Area Planning Partnership (HAPP) dated October 2017. This report was

presented to Regional and Local Councils and was submitted to the Province in response to the Growth Plan NHS that was released in 2017. Within this report there are a number of instances where HAPP recommends that the Regional NHS mapping should be used as the basis for the Provincial mapping and raises concerns with this 'Y' connection in Halton Hills. The Subject Lands contain what HAPP refers to as the 'northern link' of this 'Y' shaped connection. Specifically, the table within Appendix 1 of the HAPP report refers to this 'Y' shaped linkage as impractical and notes the following:

A y-shaped linkage is proposed within Halton Hills, extending between lands located in the existing Greenbelt NHS associated with 16 Mile Creek (the "southern link"), lands in the Niagara Escarpment Plan Area (NEPA) to the north (the "northern link") and designated greenfield areas in Southwest Georgetown to the east (the "eastern link"). This linkage is approximately 500m wide and delineation of this linkage does not appear to consider the RNHS.

It is unclear what natural lands the y-shaped linkage is intended to connect to along the 'eastern link'. It is assumed it is intended to connect to woodlands and valleylands associated with Silver Creek. The land in between is a designated greenfield area and is currently undergoing a Secondary Planning exercise. While some lands will be designated NHS and open space through that process, other lands will be designated for various residential, institutional and employment related uses. There will be no opportunity for a regional scale linkage across these lands given that no linkage has been identified in the Secondary Plan or associated Subwatershed Study to bridge the large gap between natural features that the province's GPNHS linkage is assumed to be intended to connect. Further, Trafalgar Road, which is scheduled to be widened to four lanes in the Region's Transportation Master Plan, will represent a barrier. Please consider eliminating this linkage in consideration of the fact that a connected regional scale linkage will not be possible in this area.

Given Growth Plan policies relating to Settlement Boundary Expansions as they relate to the GPNHS, outlined in section 2.2.8.f), options for expansion of settlement boundaries westward from the designated greenfield area in Southwest Georgetown will be made difficult due to the presence of the proposed 'eastern link'. While we agree that there may be justification for a local linkage in this area to connect to the more robust regional linkage between the Greenbelt NHS and the NEPA (the 'northern/southern link'), a 500m wide regional linkage (the 'eastern link') is unwarranted given the issues noted in the preceding comment and thus will constrain settlement boundary expansions in this area unnecessarily.

It is our understanding that the Region of Halton has requested that the Province remove the eastern link of the 'Y' connection given that the Secondary Plan east of Trafalgar Road does not have a corresponding 500 m wide NHS for the Growth Plan NHS to connect into and that the Region is no longer showing this eastern link as part of their Regional Natural Heritage System. If the Province agrees to the removal of this eastern link of the 'Y' connection, it is questioned whether any portion of this 'Y' connection is necessary, including the 'northern link' through the

Subject Lands given that it is unclear as to whether the 'northern link' was simply an extension of the 'eastern link' that no longer appears to serve a purpose from a connectivity perspective given the Secondary Plan land use designations east of Trafalgar Road.

It is respectfully recommended that a robust connection between the Greenbelt Plan Area and the Niagara Escarpment Plan Area already exists between Regional Road 25 and Third Line at 10 Sideroad, just a short distance to the west of the 'Y' connection created by the Growth Plan NHS (**Attachment 4**). The creation of this second extensive connection by the Province, in proximity to an existing and more ecologically meaningful connection between the Greenbelt and Niagara Escarpment Plan is questionable. Under the assumption that the Province will remove the eastern link of the 'Y' connection, as requested by the Region, we request that the Province run the computer model again to determine whether the northern link continues to be recommended in its current location once the eastern connection is removed.

Recommendation

Based on a review of mapping from the Region of Halton Official Plan Review NHS, Growth Plan NHS, Conservation Halton Online Mapping and OPA 32 mapping (Vision Georgetown Secondary Plan), as well as the Region of Halton's *Natural Heritage Discussion Paper* (June 2020) and the Halton Area Planning Partnership 2017 submission to the Province, it is respectfully requested that the Province revise/remove the Growth Plan NHS along the 'northern link' of the NHS 'Y' connection through the Subject Lands given that this NHS linkage contains limited natural heritage features and is essentially duplicating an existing robust connection a couple of kilometres to the west. This recommendation is in-keeping with the Regional and Town Council endorsed recommendation provided by the Halton Area Planning Partnership to the Province in 2017. While it is acknowledged that the current ERO Posting is specific to policy revisions, given the implications of this extensive natural heritage system on the Subject Lands, it is recommended that the Province include a review of the natural heritage system mapping as part of the process of amalgamating the PPS and the Growth Plan.

We trust the above is of assistance. If you require additional information, please contact the undersigned.

Yours truly,

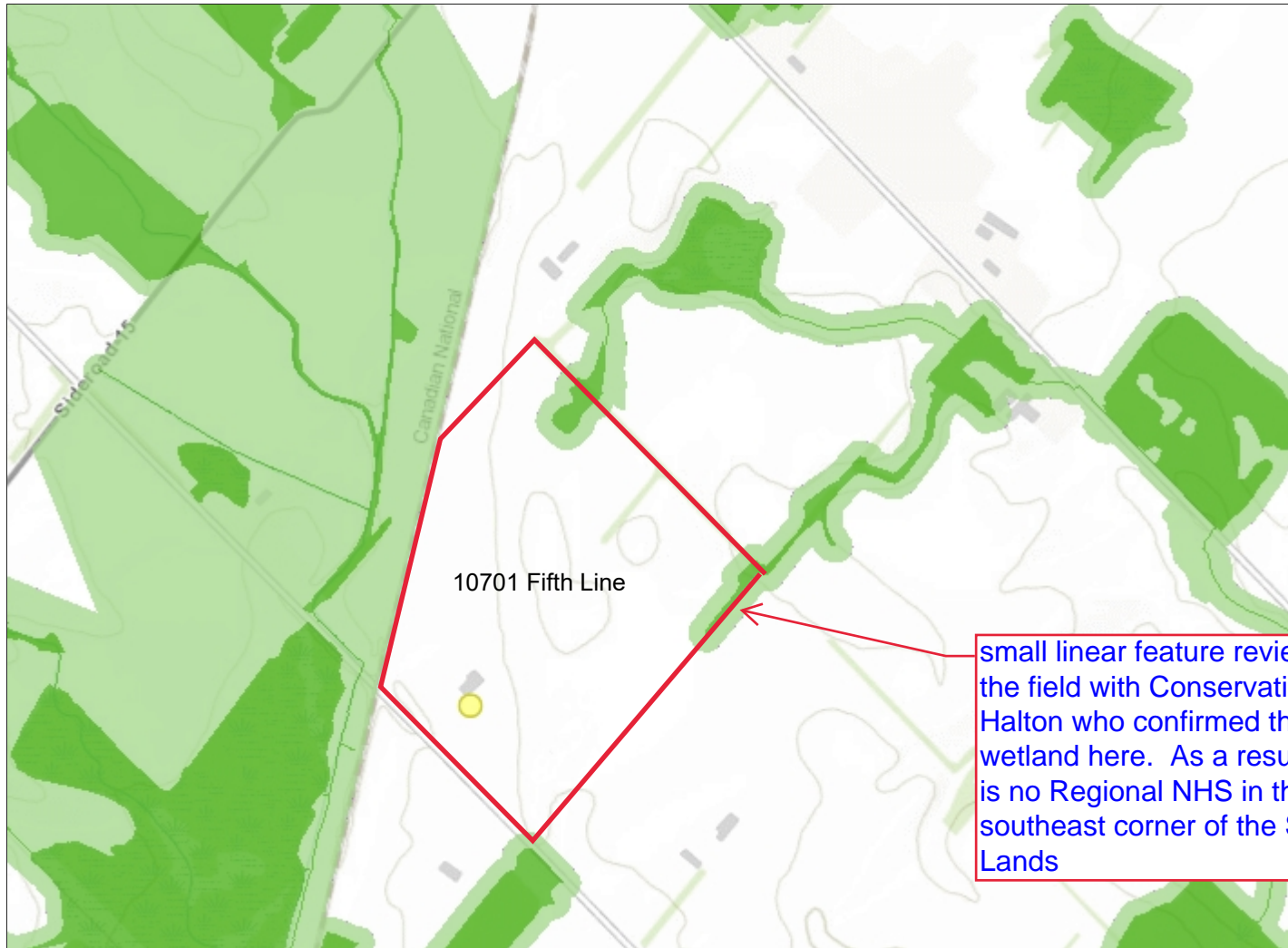
A handwritten signature in black ink, appearing to read "Jennifer Lawrence". The signature is fluid and cursive, with a large loop at the end.

Jennifer Lawrence, MCIP, RPP
President

encls. (4)

10701 Fifth Line ROPA 38 NHS

Attachment 1



small linear feature reviewed in the field with Conservation Halton who confirmed there is no wetland here. As a result, there is no Regional NHS in the southeast corner of the Subject Lands



1: 18,056

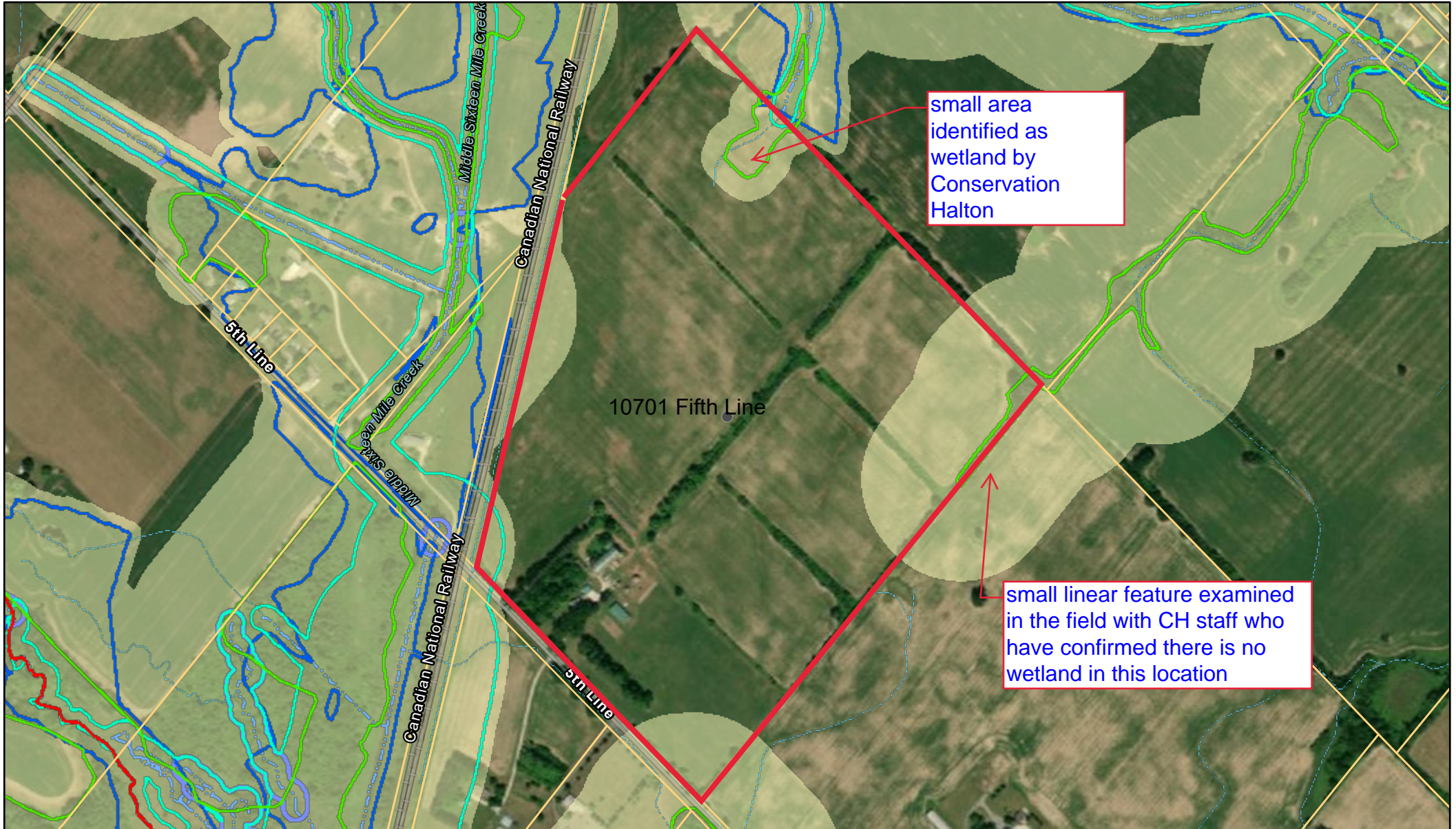
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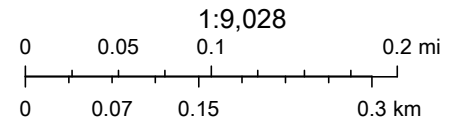
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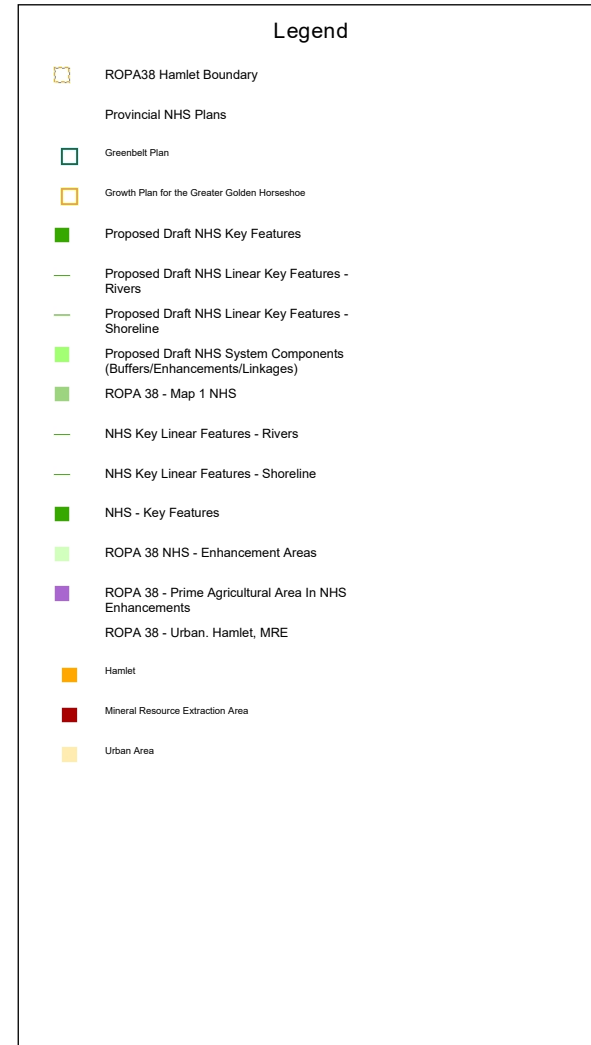
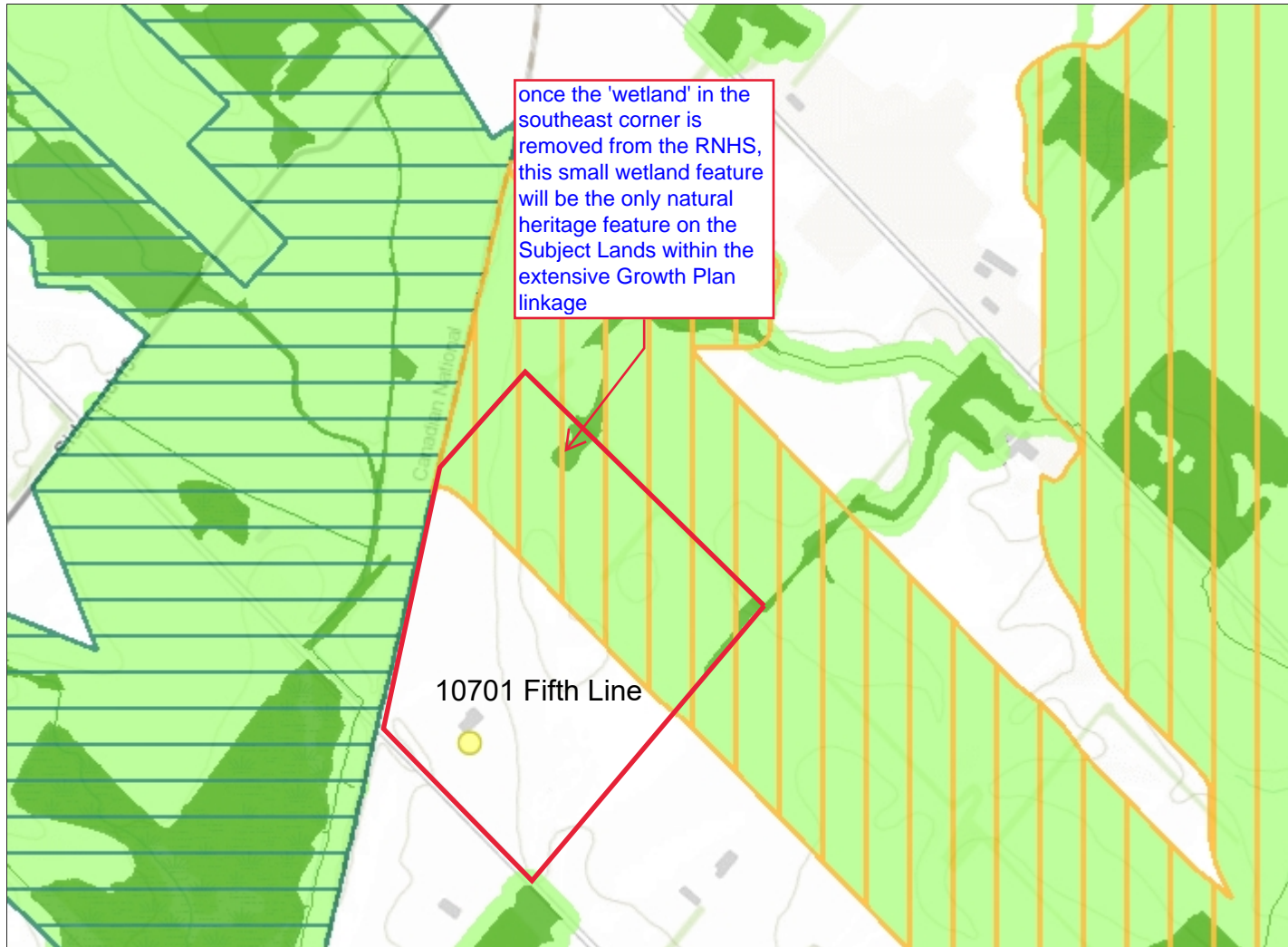
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|-----------------------|-----------------------|---------------------------|------------------------------|
| Parcels | Shoreline Hazard | Meander Belt Hazard | Waterflow |
| 100 year Flood Hazard | Headwater Floodplains | Stable Top of Bank Hazard | Regulated |
| Dynamic Beach Hazard | Floodplains Hazard | Wetlands Hazard | Hydrologic Connection |
| | | | Approximate Regulation Limit |



Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community, CH GIS, Created by Conservation Halton GIS, Sources: Esri, HERE, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community, Conservation

10701 Fifth Line ROPR NHS

Attachment 3



1: 18,056

Information Valid as of: 10/2/2020

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