



SUBMISSION TO THE ONTARIO LAND TRIBUNAL

Municipal File Nos.: D090PA20.002, D14ZBA20.009 and D12SUB20.001

OLT Case Nos.: OLT-22-004070, OLT-22-004071 and OLT-22-004722

OLT Lead Case No.: OLT 22-004070

Submitted October 14, 2022

**Prepared by the Glen Williams Community Association
Participant Statement Report - ATTACHMENT**

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INTRODUCTION

The Glen Williams Community Association was working in tandem and in good faith with the Town of Halton Hills and the appellant, Glen Williams Estates Inc. on this proposal for 102 Confederation Street in the Hamlet of Glen Williams. During this 18-month period, the association developed a constructive relationship with the appellant, a relationship that the GWCA was anxious to continue. The last contact with the appellant was approximately six months ago upon submission to the appellant of further discussion points.

This report outlines our current written concerns and proposals for solutions, based on an understanding of the Glen Williams Secondary Plan, our past discussions with the Town of Halton Hills and the appellant, and feedback from residents in the immediate area of the proposed development.

The following nine categories explain our concerns.

ALLOWABLE DENSITY

The Glen Williams Secondary Plan's objectives Section H 4.2 A - ii) call for "providing for limited new growth in designated and planned areas through development that is sensitive to the natural environment and topography of Glen Williams and is reflective of the Hamlet's character areas."

Also, Section H 4.5.3 of the secondary plan calls for "The maximum permitted density of any Plan of Subdivision developed on Regional water and wastewater services shall be 5 units per net residential hectare (2 units/net acre)."

As well the Provincial Growth Plan (PGP) notes that rural settlement areas (hamlets) are not the focus areas for intensification. Intensification targets do not apply outside the Delineated Built-up Areas (Glen Williams is not within this boundary). Only limited growth that is consistent with rural characteristics is identified for these areas.

Halton Hill's Town Planning & Development response to Glen Williams Estates on November 5, 2021 in the 09a-Sub2-Development Review Comments states:

The Glen Williams Secondary Plan objectives reconfirm the desire that only limited growth appropriate to the hamlet is to occur, and that this growth must preserve hamlet scale and character (H4.2). This has partly been captured through the requirement for developments to provide a variety of lot sizes and configurations, consistent with hamlet character. While a minimum lot size of 0.1

ha is permitted in the Glen, overall development is limited to a maximum density of 5 units per hectare.

Further, the Hamlet Residential Area policies state that plans of subdivision are required to provide a range of lot sizes between 0.1 ha and up to 0.4 ha (1 acre). Each of the lots in the proposed development fall between 0.1 and 0.2 ha (with 31 of 34 lots between 0.1 and 0.12 ha). It is not the intent of the policy for most of the lots in a new subdivision to only meet the minimum lot size in a homogeneous pattern. The increase in density contributes to the lack of variety of lot sizes; decreasing the number of lots this would provide an opportunity to comply with the Secondary Plan policy intent.

Additionally:

Policy H4.5.3(e) states that Council will only approve subdivisions that are shown to be consistent with the Hamlet Design and Heritage Protection Guidelines. The guidelines expressly state that streetscapes with uniform lot frontages should be avoided and that it is encouraged for adjacent lot frontages to vary by up to 50%. A substantial number of abutting lots have the same or similar lot frontages in long stretches adjacent to each other. To meet the intent of the guidelines (and hence the intent of Policy H4.5.3(e)), fewer lots with a greater variety of sizes and shapes are required.

The Town of Halton Hills created a review of Hamlet character and scale and conducted a comparative analysis of other neighbourhoods and areas within Glen Williams. This review looked at density and lot area of individual lots within specific areas; it considered both 'newer' subdivision areas that are also designated Hamlet Residential Area and more established Hamlet Residential Areas of Glen Williams. The review suggests that the proposed development is noticeably denser than any of the comparative areas. Based on this conclusion, it is the Town's opinion that the Glen Williams Estates development is not consistent with the hamlet scale or character and will not satisfy the intent of the Glen Williams Secondary Plan nor the Hamlet Residential Area policies.

The Town also comments that they are unaware of any other developments within Glen Williams that have been approved at a greater density than 5 units / ha in the past.

The applicant's plan calls for a density of 6.9 homes per hectare. The applicant plan does not align with the objectives and requirements of the GWSP or the PGP as it relates to allowable density. The GWCA has already communicated its strong objection of this plan to GWE. We understand the Town has also advised the applicant they do not support a density of 6.9 units per hectare.

GWCA previously suggested to the applicant that the density could be reduced by eliminating some of the homes (Lots # 4 to #9). This would reduce the density to about 5.6 units per hectare.

WELLS

As noted in the GWSP Section H 4.3.5,

Glen Williams' water is supplied entirely from groundwater using three municipal well fields: Lindsay Court, Princess Anne, and Cedarvale. Glen Williams is entirely located within the CTC Source Protection Region...Maintaining water balance and flow paths is essential to maintaining overall watershed health and patterns of annual runoff, evapotranspiration and infiltration. Much of Glen Williams is within a wellhead protection area quantity (WHPA-Q)...Credit Valley Conservation has established the water balance criteria to protect groundwater, baseflow and other natural features, such as woodlands and wetlands. The incorporation of monitoring infrastructure may be required to address pre and post conditions related to infiltration, runoff, and evapotranspiration with development applications. It is an objective of this Plan to protect groundwater resources.

The Region of Halton Urban Services Guidelines

<https://www.halton.ca/Repository/Urban-Services-Guidelines> suggest:

Halton Region staff will ensure the following is complete by the owner as a condition of approval:

- *Prior to construction, a survey of all wells within 500m of the site or within the area of influence as determined by a hydrogeologist*
- *Monitoring of the wells during construction and for a minimum of one year after all construction ceases.*

The applicant has indicated they have completed a desktop review within 250m of the site and completed a door-to-door survey within 100m of the external sanitary line and that their dewatering calculations indicated that the zone of influence from any dewatering along the sanitary works would be approximately 38m.

The applicant also indicates that their survey results show that residents within 100m of the external sanitary line are serviced with municipal water and that based on the information received from their survey, they indicate that any existing water wells are not currently used as a domestic drinking water supply.

The GWCA is aware of at least one resident at 98 Confederation, a property located 61 meters from the 102 Confederation entrance, has a well they use as their sole water source. They confirmed to the GWCA that they had no knowledge of a survey of their property. The Environment Implementation Report 02 – Applications – Sub2-EIR Final May 2021, Table 3-1 Private Water Well Survey Response Summary, (p 52) incorrectly notes the status for 98 Confederation. How many other properties may have been missed in this survey that should be monitored pre-construction? And how many more may be affected postconstruction?

Glen Williams is currently experiencing dry wells at the bottom of the hills below the active Eden Oak (The Chase) recently constructed development. These residents were not included in any survey done by Eden Oak developer pre-construction. The Region has now contacted the developer associated with Eden Oak development who bears the responsibility for investigating well complaints within the vicinity of their development and investigation has begun to address the issue of water supply.

The GWCA raises the following issues:

- A desktop review may not be considered acceptable as it is not mentioned in the Urban Services Guidelines.
- If the surveys were conducted door-to-door then residents may not have been at home; if done electronically, some residents in the hamlet do not use this type of communication.
- Correspondence from the Region of Halton on March 7, 2022, (09a-Sub2-Regional Comments) confirms that multiple issues remain, including reach of survey and geological issues that must be addressed.
- Was the applicant's reach sufficient? Glen Williams has many older residential homes and there are still wells in the area used as sole water sources.

The applicant and the Region must work collaboratively to ensure an appropriate monitoring reach for this hamlet and that all residents with wells within this reach are aware of the need to be monitored pre-construction. No residents should have well issues post-construction. Design decisions must not negatively impact the Glen Williams watershed, watercourses or waterflows.

IMPACT OF PROPOSED AMOUNT OF CUT AND FILL

The applicant suggests the 02-Applications-Sub2-FIG3C-Site Earthworks Plan has been prepared to illustrate the degree of cut/fill areas and associated depths. The Environmental Implementation Report Section 3.2.6.2, (p 10) states that, "... a portion of the lands north of the Subject Lands are within the Natural Heritage System of the Greenbelt Plan. Some grading on the lands to the north is proposed in order to assist with minimizing the use of retaining walls on the Subject Lands."

This information does not provide a clear indication of the scope of the cut and fill operations required to accomplish the planned design, therefore the dramatic change to the topology and ecology of the land is not readily evident in the documents.

From the GWCA's observations, as per the table in 02-Applications-Sub2-FIG3C-Site Earthworks Plan, there will be 50,481 more cubic meters of soil that is "cut" than is filled. This is equivalent to about 5,000+ truckloads (50,000/10 i.e., 10 cu metres per truckload) that must be placed somewhere.

In addition, if the land to the north is not approved for receiving approximately 27,000 cubic metres of fill, will have to be trucked from the site, meaning an additional 2,600 truckloads leaving the property. There are concerns about what will done with the excess soil and how it will be transported and if, in fact, topsoil will be reinstalled.

The GWCA has had previous discussions with the Town about these concerns and we understand that the Town concurs and would seek the applicant to leave a larger amount of topsoil e.g., 12" instead of the typical 6". The GWCA supports this request.

The Environmental Impact Report – Volume 3 Appendices – Section 5.1 Slope Conditions and Profiles (p 127) indicates that ravine slopes typically range from 14m to 23m with steepness from 3.5:1 to less than 5:1. Sections 1 and 7 on the Site Grading Plan (p169) indicates a new proposed artificial slope of 2:1 which is significantly steeper. All revised grading slopes should be restricted to being no steeper than the existing grading.

Environmental Impact Report – Volume 2 FSR Final – Site Grading Plan – At properties 5 and 6 the existing hill is proposed to be cut 11m (36'). There is also significant cut and fill on other areas of the site.

As part of the draft plan approval, the applicant should be required to submit a 3D topographic model of the existing and proposed grading to graphically demonstrate the significant changes that will be occurring. Many residents of Glen Williams cannot read a topographic map and the extent of proposed changes should be understood by everyone involved.

REMOVAL OF THE HILL/RIDGE ON NORTH SIDE OF APPLICANT PROPERTY

While the proposed removal of the hill/ridge on the north side of the applicant property has been noted in other sections of this submission it does warrant additional focus due to the magnitude of the negative impact of its planned removal.

The Glen Williams Community Association is not in favor of high retaining walls.

The Glen Williams Community Association notes that much of the hill/ridge could be preserved if the developer eliminated some of the homes. This would also reduce the problem of establishing road grades of less than 6%, noting that a considerable number of the existing roads in the Glen have grades in excess of 6.0%.

Preserving the hill/ridge on the north side of the applicant property would:

- Reduce the density to about 5.6 units per hectare closer to requirements in the Glen Williams Secondary Plan.
- Reduce the environmental and climate impact,
 - No need to remove the woodland
 - less earth removal
 - reduce amount of soil to be removed
 - reduce water flow onto applicant and surrounding lands from flattened property to the north
- Improve health and well-being of current residents

The GWCA also notes that the submitted plan conflicts with the Town's stated commitment to the 'environment'.

HAMLET BUFFER

Section H 4.3.6 of the Glen Williams Secondary Plan states

“In some areas of the Hamlet, a buffer has been provided between the existing boundary and new developed areas. New buffer areas shall be conveyed as public open space. Historically, this buffer area has been provided through private open space and public open space inclusive of parts of the trail system. Planned areas still to be developed shall consider adjacent boundaries and land uses beyond the Hamlet Boundary to determine a general lot line setback of at least 5 to 10 metres to the Hamlet boundary to maintain a Hamlet buffer area. Opportunities for parks open space and trails should be assessed within the Hamlet buffer area for future development in accordance with the Active Transportation Master Plan. Public ownership of the Hamlet Boundary buffer area within New Planned Areas shall be required.”

The applicant plan does not appear to provide for a hamlet buffer along the north property line of the planned development.

The Town response to the applicant in the November 5, 2021, Deficiencies in Draft Plan of Subdivision, Official Plan Amendment and Zoning By-law Amendment Application Submission FILE NO's.: D09OPA20.002, D14ZBA20.004 & D12SUB20.001 states:

The applicant needs to demonstrate how the intent of the Secondary Plan Policy requirement for a buffer has been met. Based on implementation of the Hamlet Buffer in various forms over the past few years, on lot buffers/easements are no longer acceptable ways to meet the objectives of the hamlet buffer and the buffer must be dedicated to the Town...Comments from Recreation and Parks also discuss the requirement for this buffer.

The Glen Williams Community Association strongly urges acceptance of the Town's stated request above. The provision of a hamlet buffer was contained in the original secondary plan, approved by the then Ontario Municipal Board, and re-affirmed in the recent update of the plan in 2021.

Additionally, the Credit Valley Conservation confirms the GWCA view. Their comment referenced in 9a-Sub2-CVC, item #8 regarding the need for more density of plantings than what is proposed states:

...the planting densities for trees are proposed at 5 m centres, and that would cover 'up to 60% of the area'; this density is much less than typical. Considering anticipated die-off of planted material, typical planting density is usually planned

at 1200 trees/ha (i.e., 2-4 m on centre) to achieve a treed community. Please revise.

The Town has asked Glen Williams Estates to provide at least a “planting” buffer, noting, “This will not necessarily be 10 meters in width but should be sufficient to provide a visual screening”. It is unfortunate that the Town is not supporting alignment to the secondary plan. A visual screening does not equal a buffer.

The Glen Williams Community Association requests that the applicant align with the secondary plan and that a buffer closer in size to 10 meters be implemented.

TRAILS

The objectives of the Glen Williams Secondary Plan as noted in Section H 4.2 include:

“To protect and enhance open space areas by i) maintaining and enhancing the Hamlet’s open space, park and trail system, inclusive of buffer areas; ii) reinforcing the importance of visual and physical access to open space areas trails and parks, as an integral part of Glen Williams; and, iii) creating and sustaining attractive and well-designed streetscapes and public realm. e) To promote and protect connectivity by i) providing improved linkages to the commercial and community facilities of the Hamlet core area; ii) supporting and enhancing streetscapes and the public realm; iii) providing an environmental framework which serves both the existing and future community, which is formed by linking existing and new open spaces, natural heritage features and areas, parks and the developed areas of the Hamlet; iv) supporting an active transportation network for the Hamlet; and, v) ensuring safe and effective traffic and pedestrian movement throughout the Hamlet and minimizing impacts of traffic from new development.”

It should also be noted that Glen Williams has existing public trails, which form an important part of the active transportation network and provide opportunities for recreation. Trails are located throughout Glen Williams including the many natural and open space areas along the Credit River as identified in Schedule H 4-3 of the Glen Williams Secondary Plan.

There is an established trail system behind the proposed development property that hamlet residents have been using for many years. The GWCA recognizes that Town staff has been involved in discussions related to trails with the Region of Halton, Credit Valley Conservation and the applicant to resolve issues pertaining to trail locations vs. natural heritage policies.

The applicant has proposed a new very small, looped trail behind Lots 13-16 as shown in yellow on Figure 5a: Proposed Town Trail Network. The GWCA does not consider this a trail. The proposed ‘trail’ suggests that the street itself is used as part of the trail with a very small walkway behind lots 13-16. Nor does the proposed solution consider incorporation of other existing adjacent informal trails, which are already well-developed. Transitioning them to formal trails would not require any widening or removal of trees. The applicant’s solution is inadequate and reflects a lack of consideration for the maintenance of even some of the hamlet’s usual amenities.

It is our understanding that the Town has provided the applicant with a recommended trail system that would honor the intent of the Glen Williams Secondary Plan and we strongly urge the Tribunal to support acceptance of the Town's trail plan as submitted to the applicant, in Figure 5a: Proposed Town Trail Network.

In addition, the GWCA strongly urges other relevant portions of the municipal and regional policy be validated, for example, the Halton Hills Active Transportation Master Plan (ATMP).

The Halton Hills Active Transportation Master was completed in 2020 and serves as a blueprint to guide the development of active transportation within the community and should be used to guide the implementation of active transportation infrastructure. The ability to travel through the community via active transportation is viewed as an important element of the Hamlet character. The Plan shall provide for the development of an extensive network of active transportation routes, including on-road facilities and off-road trails, in accordance with the Halton Hills Active Transportation Master Plan. The network should link new and existing residential areas to the community core and complement the infrastructure identified through the Halton Hills Active Transportation Master Plan. Conceptual alignments for proposed infrastructure are shown on Schedule H 4-3 in accordance with the Halton Hills Active Transportation Master Plan. To accommodate future trail alignments within these areas a minimum 10 metre top of bank setback is required. Where feasible, trail connections through buffer areas should be considered subject to Town and Credit Valley Conservation approval. Additional buffers may be required in accordance with Section H 4.3.2 (Natural Heritage System) of this Plan. Trails are permitted within the Regional Natural Heritage System in accordance with the ROP.”

RESIDENT SAFETY

From the figures in the Cut & Fill plans,02-Applications-Sub2-FIG3C-Site Earthworks Plan it appears that there will be approximately 50,000 to 77,000 cubic metres of fill to be trucked out under the current plan. This is approx. equivalent to 5,000 to 7,000 truckloads out and then a return trip i.e., 10,000 to 14,000 truck trips.

It should be recognized that the implementation of the Glen Williams Estate creates both an impetus and an opportunity to address a long-standing safety issue. There is only one way in and out of the planned development onto Confederation Street. There are already limited sight lines on this road because of the hill just above the planned entrance to the development. There are currently speeding issues which the Town and Halton Region Police have been engaged to help solve.

It would be dangerous to:

- 1) permit additional traffic without first installing a formal path between Mountain St. and Wildwood Road along Confederation St. for pedestrians. This should be a rural design pathway, rather than an urban one.
- 2) Not address the risk arising from traffic travelling southbound on Confederation Street and emerging traffic from Mountain Street and the GWE development.

The Halton Hills Active Transportation Master Plan <https://www.halton.ca/For-Residents/Roads-Construction/Infrastructure-Master-Plans/Active-Transportation-Master-Plan/Active-Transportation-Master-Plan-Study-Report> states that:

The ability to travel through the community via active transportation is viewed as an important element of the Hamlet character. The Plan shall provide for the development of an extensive network of active transportation routes, including on-road facilities and off-road trails, in accordance with the Halton Hills Active Transportation Master Plan. The network should link new and existing residential areas to the community core.

The importance of the above is that there be a safe pathway for residents to get from the proposed development to the core of the hamlet, which would also allow other Glen Williams residents to safely access the trail system behind the property.

TRAFFIC CONCERNS

Glen Williams is currently experiencing serious traffic problems which jeopardize the safety and health of residents. The GWCA is currently working with the Town on a holistic plan to address these concerns of speeding, noise and parking issues. This will be a multi year plan due to cost and Town resources.

The GWCA recognizes that a Traffic Impact Study (TIS) has been conducted. While the Town has clarified that the volume estimates applied to a 1-hour peak measurement for AM and another for PM, and that the estimates are based on established/formal formulas over which the Town has no control, we note that the traffic estimates do not appear to include any provision for:

- the increased truck traffic during construction which raises questions about the validity of the estimates.
- based on other new homes in the Glen of likely similar value, there will be a minimum of 2 cars per home, with typically both homeowners working. It is more realistic to assume 1.5 cars leaving each home in the morning for a total of 51 cars, rather than the 29 assumed in the TIS report.
- additional traffic on a daily basis for school buses and private cars attending local schools, delivery vehicles, etc.

Increased traffic estimates should also be considered because of the planned Bishop's Court Phase 2 development. Bishop's Court is sited approximately 1.2 km north of the GWE planned development. The same road, Confederation St., would be used for all incoming and outgoing traffic from this additional development which will exacerbate the current situation. The timing of these two developments should be considered.

A resident of Glen Williams provided the following information which the Glen Williams Community Association supports. (9a PUBLIC 100 Confederation St.)

Environmental Impact R – Volume 3 Appendices – Paradigm Traffic Study – The DSD [Decision Sight Distance] from the south is indicated at 325m (p10 of Paradigm Report) which is incorrect. As a vehicle proceeding northbound reaches the driveways of 98 and 100 Confederation, there is a slope transition which removes all visibility of 102 Confederation and further for a brief period of time.

Environmental Impact Review – Volume 3 Appendices – The traffic report clearly indicates that

“The sight distance at Confederation St. at St. A meets and exceeds the intersection sight distance for both directions and meets the decision sight distance from the south. The proposed intersection however falls short of the decision sight distance from the north by 53 metres. To achieve sufficient sight distance, the intersection would need to be located approximately 53 metres to the south. However, given the development has direct frontage to Confederation St. where St. A is presently proposed, relocating the connection is not feasible.”

This statement explicitly indicates that the intersection will not be safe and that it should be moved. As the DSD values are already not correct based on artificially derived vehicular speeds, the issue would be further exacerbated when actual speeds are used.

Please see photos on the pages following. The photos are meant to show the narrowness of Confederation St., the crests just to the north and south of the entrance/exit of the proposed development which reduce sight visibility creating safety concerns



Standing in 102 Confederation laneway looking north on Confederation St. with Mountain St. in view on the right hand side of the crest. This shows the top of the north crest which makes turning right out of the development risky.



Standing in 102 Confederation laneway looking south on Confederation St. toward the intersection with Wildwood Rd. This photo shows the risk of turning left from proposed development because of the lack of safe sight line.



Standing in 102 Confederation St. laneway. Showing top of crest to the north, with Mountain St. intersection just on the right behind the arrow.

NEED FOR LOW IMPACT DEVELOPMENT MEASURES (LID)

The GWCA has previously expressed concerns regarding possible need for a Storm Water Management Pond to deal with the increasing impacts of climate change that we have seen Glen Williams experience in the past few years, particularly as Credit Valley Conservation had noted a drop in infiltration as a result of the proposed construction.

While the Credit Valley Conservation has indicated it was satisfied with the plan for use of LID measures the Town has noted that they are not yet satisfied with GWE's analysis regarding planned absorption by the proposed LID measures.

While we recognize there is an increasing trend towards the use of LID measures the GWCA strongly supports the Town's concerns regarding planned absorption by the proposed LID measures.

WATER BALANCE ASSESSMENT

The Glen Williams Community Association has previously expressed concerns to the Town and the applicant that levelling of the land to the north of the subject development property could add to the potential flooding onto the applicant land.

We understand that the Town has now hired an engineer that can do the necessary review of the water balance calculations. The GWCA wishes to engage in continued discussions to ensure that should the levelling of the land to the north happen, residents can be assured that this will not add to potential flooding into the applicant and surrounding current resident properties.

DEVELOPMENT DESIGN

The GWSP Section H 4 – Objectives b - iv) suggest that “maintaining and enhancing the character of Mature Neighbourhood Areas by ensuring that new housing, replacement housing, additions, alterations, and new or enlarged accessory buildings, are compatible, context sensitive, and respectful of the existing character of the neighbourhood.”

In the Draft Plan of Subdivision labelled as Final Draft Plan of Submission Aug 11, 2020, the lot sizes and frontages are all similar except for corner lots which have smaller frontages to keep lot sizes uniform. There should be a variety of lot sizes that reflect the current development properties in Glen Williams that range from 0.1ha to 0.3ha. The Eden Oak (The Chase) and Meadows of the Glen developments have set this precedent. This applicant should be held to the same.

On behalf of adjacent property owners, the development proposal should include provision that the new lane way accessing the development be treated with a combination of landscape elements (gabion fencing) and mixed deciduous/coniferous plantings that mitigate vehicular noise, address sight lines, and ensure street lighting with full cut off to ensure zero light spillage into the adjacent properties. Solutions should be designed and coordinated with input and sign-off from adjacent property owners.

ENVIRONMENTAL IMPACT

The developer plans to remove the hill/ridge on the north side of the property containing a significant woodland with many mature trees.

The applicant has stated the Region agrees that this ridge does not meet the minimum size criteria to be considered a significant woodland and that it does not meet the criteria to be considered a Significant Wildlife Habitat and that as a result the wooded area is not required to be maintained on the subject property. This loss will have a significant environmental impact. Such a change is inconsistent with the Town's stated policy re protecting the environment.

The applicant suggests that a significant amount of tree planting and restoration work is proposed within the substantial buffers to the valley/ woodland/ wetland, in areas that are currently agriculture lands as well as restoration within a portion of the valley in an area that is currently disturbed by recreational vehicle use.

The GWCA would point out that:

- The forested area on the 2nd hill contains many 50 – 60 yr. old sugar maples with some well over 100 yrs. old. The Town has stated that it intends to become carbon neutral in a little over 7 ½ years. Such objective will certainly be set back by removing these trees and this amount of soil. If the development is allowed to encroach on the natural heritage land, there would be in the range of 3,000 years of tree growth removed, just along the fence line! This does not count trees inside the property line.
- No amount of tree planting will overcome the environmental impact of removing the ridge and removing the topsoil from the area. Such actions are directly in conflict with the Town's stated policies of addressing climate change.
- The planned density of replacement plantings is not adequate as per document 9a – Sub2 - CVC dated October 19, 2021 item #8.

CONCLUSION

The GWCA has attempted to work with the Town of Halton Hills and other developers to ensure that the Glen Williams Secondary Plan is followed and that the concerns of residents are identified. To date, the proposal from Glen Williams Estates Inc., has fallen short. There are legitimate issues to be addressed, related to the secondary plan and the unique environmental, historical and topographical aspects of the hamlet. We welcome the opportunity to resume productive discussions about the Glen Williams Estates again.