

SUBMISSION TO THE ONTARIO LAND TRIBUNAL
ADDITIONAL INFORMATION IN SUPPORT OF THE
GLEN WILLIAMS COMMUNITY ASSOCIATION'S
APPLICATION FOR STANDING

Case No - OLT-22-004222

Prepared and submitted by
The Hamlet of Glen Williams Resident Association Inc. #001959883
(Locally known as The Glen Williams Community Association)

October 28, 2022



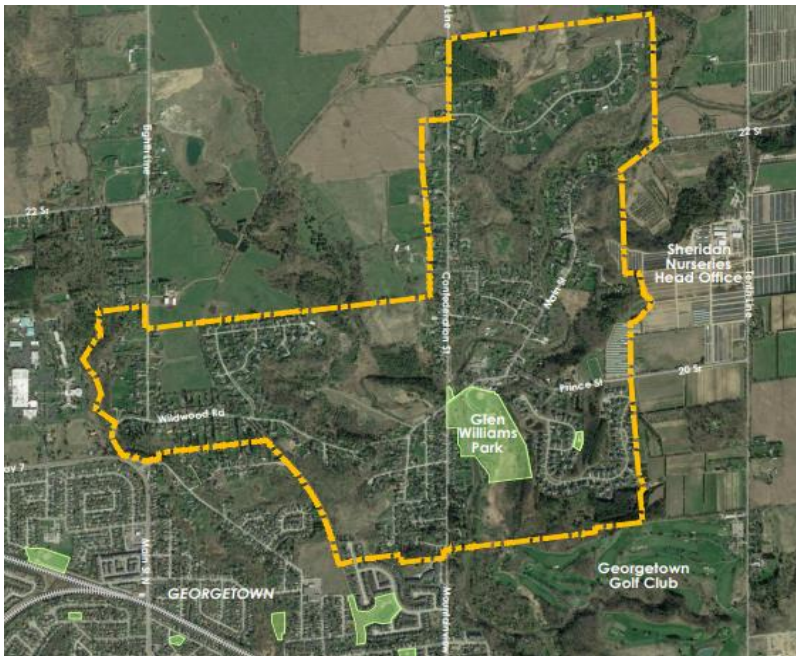
The Hamlet of Glen Williams

Glen Williams is bound by significant environmental and topographical features, with the Niagara Escarpment to the north and west and is surrounded by other natural protected areas to the north, east and west. The Credit River traverses the hamlet from the northwest to the south flowing through the village and extending 90 km from the Niagara Escarpment, emptying into Lake Ontario. See *Figures 1 and 2 below*.

Figure 1



Figure 2



Situated on the banks of the Credit River valley at the north end of Georgetown along the Niagara Escarpment, Glen Williams is part of the town of Halton Hills, Ontario. It has a variety of natural amenities, including multiple open space and park areas adjacent to the Credit River including several

Bruce Trail accesses. Glen Williams is served by multiple community services and facilities including the Glen Williams Town Hall (established in 1870,) and maintained by an active Town Hall Board, Glen Williams Public School, Glen Williams Park and Ball Field, Glen Williams Cenotaph, St. John's, St. Alban the Martyr Anglican Church, and the Glen Williams Cemetery.

Glen Williams is home to many species of birds, mammals, and fish, with the river and nearby conservation areas providing exemplary habitat for several species that have been designated as at risk, for example, barn swallows, bobolinks and hooded warbler. [species at risk cheltenham to glen williams](#)

It is a vibrant hamlet with character and a true sense of community with a community core where residents still gather at their local town hall, churches, school and neighbourhood park for celebrations, meetings and important occasions.

It is the variety of each of these natural amenities and features that define Glen Williams, its unique environment and its distinctive character, all of which needs collective care and consideration. The Glen Williams Secondary Plan (GWSP), OPA 44 is the vehicle through which the community can ensure this.

The Glen Williams Secondary Plan (2021) Review

The development of OPA-44, which is under appeal, was initiated for valid and correct purposes.

The HGWSP adopted in 2007 preceded a number of Provincial and Regional Plans which had revised policy directions for growth and development in Ontario. In addition, Town staff and the GWCA had identified a number of issues that required further review and consideration.

A scoped review of the existing HGWSP was conducted to enable the Town to appropriately respond to these planning considerations. Review goals included:

- *Conformity to Provincial and Regional Plans.*
- *Confirmation that the goals and objectives of the Secondary Plan remained relevant;*
- *That Hamlet Design policies and design guidelines were updated to reflect best practices that are sensitive to community context, including best practices for the design of stormwater management ponds to minimize impacts on adjacent Neighbourhoods; and,*
- *That natural heritage and environmental policies were updated to conform to provincial and regional policy while acknowledging the existing community context of Glen Williams (e.g., a Hamlet that provides a transition between the Georgetown Urban Area and the surrounding agricultural and rural landscape).*

<https://www.haltonhills.ca/en/residents/resources/documents/Public%20Engagement%20and%20Consultation%20Plan.pdf> p 1.

Goal & Objectives of GWSP OPA 44

The Town of Halton Hills BY-LAW NO. 2021-0046 – Appendix A – H4.1 & H4.2, clearly articulates this goal.

The goal of the Glen Williams Secondary Plan is to protect and preserve the natural and cultural heritage features of the Hamlet and to guide change that maintains and enhances the unique character and natural environment of the Hamlet.

As well as these high-level objectives:

- a) To manage growth and change,*
- b) To protect and enhance the Hamlet's cultural heritage value,*
- c) To protect natural heritage,*
- d) To protect and enhance open space areas,*
- e) To promote and protect connectivity.*

Created with the Community

The review of the Glen Williams Secondary Plan included an extensive four phase review and engagement process. It commenced in March 2020 and significant public consultation and engagement took place to ensure that the community was well informed of the process, engaged through the development of the updated policies, design guidelines and required mapping changes.

Stakeholders from Glen Williams including individual Glen Williams residents, representatives from the Glen Williams Community Association, landowners, local businesses and business-owners participated throughout the review process. The GWCA attended all public forums provided by the Town, as per the Public Engagement Strategy of April 2020, through to approval of OPA 44 in 2021. The GWCA also participated in stakeholder interviews with the Town, had ongoing one-on-one meetings with Town staff and provided ongoing written communication and input at each milestone throughout the process.

The Secondary Plan review process was a community-integrated process that was shaped by input from the public and key stakeholders, as defined in the Town of Halton Hills' Public Engagement and Consultation Plan, Scoped HGWSP, Date: March 20, 2020 –

(<https://www.haltonhills.ca/en/residents/resources/documents/Public%20Engagement%20and%20Consultation%20Plan.pdf>)

The Glen Williams Community Association as an elected voice for the residents of the hamlet expect Town of Halton Hills staff, elected officials and interested developers to engage in good faith and implement the plan as approved.

The Tribunal is urged to consider the weight and importance of the public's involvement in the process of creating the OPA 44 and all implications to the public interest of any further changes to OPA 44 or exceptions granted to appellants.

Significant Vetting Process of the Glen Williams Secondary Plan

In January of 2020, MacNaughton Hermsen Britton Clarkson Planning Limited (MHBC) and WSP, both highly reputable planning and urban design firms, were hired by the Town of Halton Hills to undertake the scoped review and update to the Glen Williams Secondary Plan. The Scoped Secondary Plan Review was undertaken to ensure the Plan that was adopted in 2007 was reflective of current policies at the Provincial, Regional and Local level and addressed recent development and community concerns.

A review of the regulatory and policy framework applicable to planning and development in Glen Williams was conducted as part of the background review. The key policies and regulations reviewed include the below as depicted in the Summary of Background Report, Executive Summary, p 4 - <https://www.haltonhills.ca/en/residents/resources/Documents/Summary%20of%20Background%20Report.pdf>

- Provincial Statutes: *Planning Act*, (1990) *Places to Grow Act*, (2005) *Greenbelt Act*, (2005).
- Provincial Policies: Provincial Policy Statement (2020), A Place to Grow (Growth Plan) 2019, Greenbelt Plan (2017)
- Official Plans: Upper-Tier Municipality Region of Halton Official Plan, Office Consolidation 2018, Lower-Tier Municipality Town of Halton Hills Official Plan, 2017, In-Effect HGWSP, 2007
- Land Use Control Instruments: Subdivision Control, Plan of Subdivision, Consents, Interim Control By-Law, Zoning By-Law, Holding By-Law, Increased Density/Height, Site Plan, Minister's Zoning Order, Development Permit System

This extensive review which used the required regulatory and policy framework applicable to planning and development must be considered as the strongest litmus test that the GWSP, OPA 44 met stringent planning and development requirements for Glen Williams. Therefore, the GWSP, OPA 44 should continue to be implemented as approved for all development applications within Glen Williams.

Sensitive And Special Features of Glen Williams

Glen Williams is within the middle reach of the Credit River Valley, under the jurisdiction of the Credit Valley Conservation and subject to Ontario Regulation 160/06 of the *Conservation Authorities Act* (1990). The Credit River and one of its tributaries flow through the centre of the area, and Silver Creek flows along the western border. The northern portion falls within the Credit River sub-watershed, and the southern portion is within the Silver Creek sub-watershed.

A significant portion of Glen Williams is also designated within a Natural Heritage System, according to Greenbelt and Growth plan policies and criteria. The Natural Heritage System is a recognized and evidence driven systems approach to protecting and enhancing natural features and functions within the Hamlet as shown on Schedule H4-1 and H4-2 of the GWSP, OPA 44.

Three of the four planned areas for development as noted in Schedule H-4.1 in the GWSP, OPA 44, are NOT flat farmers fields. Each of them is unique in its character, topography and natural features representing the natural valley lands of Glen Williams. Three of the four planned areas for development include areas designated as a Natural Heritage System also including Natural Heritage Supportive Areas. One planned area for development also has a designated Special Study Area.

The GWSP, OPA 44, acknowledges these sensitive and special features and provides direction as noted below:

H4.3.2 NATURAL HERITAGE SYSTEM

The natural heritage features and areas within the Secondary Plan are currently identified through Provincial, Regional and local designations and policies in addition to the policies and regulation of the Credit Valley Conservation (CVC).

The Natural Heritage System is defined by the Region of Halton as a critical component of a healthy community and helps to define the character of the area. The Natural Heritage System reflects the systems approach taken to ensure the protection, preservation and enhancement of key features and components to maintain biological diversity and ecological functions of the area. For the purposes of this Plan, any italicized definitions in this Plan reference defined terms in the Region of Halton Official Plan.

The Natural Heritage System shown on Schedule H4-1 and H4-2 is a systems approach to protecting and enhancing natural features and functions within the Hamlet.

H4.3.2.1 Significant Valleylands

The Glen Williams Secondary Plan Area is within the middle reach of the Credit River Valley, under the jurisdiction of the Credit Valley Conservation and subject to Ontario Regulation 160/06. The Credit River and one of its tributaries flow through the centre of the Area, and Silver Creek flows along the western border. The northern portion of the Secondary Plan area is within the Credit River Subwatershed, and the southern portion is within the Silver Creek Subwatershed.

The Hamlet of Glen Williams historically developed within the valley of the Credit River. Any changes to existing development within the Valleylands are subject to the Credit Valley Conservation regulation. Significant valleylands shall be protected to provide important terrestrial and aquatic habitats, supporting highly diverse and productive ecosystems, connecting landscapes by linking riverine wetlands and watercourses to adjacent woodlands and upland habitats. Applications for development that are within 120 metres of significant valleylands shall include an Environmental Impact Assessment in accordance with Section C2 of the Official Plan, and the Region's EIA guidelines, and in consultation with Credit Valley Conservation.

H4.8.3 Natural Heritage System Supportive Area

The 2007 Secondary Plan for Glen Williams provided for a Supportive Greenlands designation which contained functions and linkages that support the ecological function of the features in the previously designated Core Greenlands designation. The former

Supportive Greenland designation is now shown as Natural Heritage System Supportive Area on Schedule H4-1 and H4.2. The Natural Heritage System Supportive Area will benefit from rehabilitation or restoration efforts to enhance their ecological value. Any proposal for development within the Natural Heritage System Supportive Area must be accompanied by an Environmental Impact Assessment that can demonstrate the ecological function of the area can be maintained, and environmental impacts can be appropriately mitigated.

H4.9 Special Study Area

A Special Study Area is shown on Schedule H4-1 and H4-2 of this Plan, which is subject to further study and assessment through an Environmental Impact Assessment as part of the site-specific development application. Until such time that the recommendations of this Study have been determined and approved by the Town and Region of Halton these lands are proposed to be subject to the Natural Heritage Supportive Area Policies of this plan.

Glen Williams has an extensive trail system connecting the community with the Bruce Trail and Credit Valley Conservation Trails. If the goals and objectives of the Glen Williams Secondary Plan OPA 44 are not implemented in future development, then this additional special feature also at risk.

H4.3.3 Trail Systems. As well as our numerous other cultural heritage resources including the topography and natural features, public spaces, parks and streetscapes (i.e., the public realm), settlement patterns, including, but not limited to, circulation, streets, and trails, lot configuration and significant views and vantage points – H4.3.9 CULTURAL HERITAGE RESOURCES – H4.3.9.

Hamlet Buffers 2007 and 2021

The Hamlet of Glen Williams Secondary Plan (2007) was originally adopted by Town Council in July 2003 and approved by the Region of Halton in 2005. The Secondary Plan only came into full force and effect in 2007 once all appeals by developers were settled at the Ontario Municipal Board.

During the development of the Hamlet of Glen Williams Secondary Plan (2007), the need for and importance of hamlet buffers was validated by and supported through agency and public submissions as noted in Glen Williams Secondary Plan REPORT NO. PD-2021-0039.pdf.

As detailed in the Hamlet of Glen Williams Secondary Plan (2007), “The Secondary Plan implements a Hamlet Buffer surrounding the entire limits of the Hamlet with the objective of preserving the Hamlet character. The Hamlet Buffer is a general lot line setback of 20 metres from the Hamlet boundary. Lands within this setback were determined to regenerate as private natural areas or be used for public park purposes such as trail systems.”

The origin of the hamlet buffer to protect the ‘look and feel’ of Glen Williams began in 2003 during the discussions of the initial Hamlet of Glen Williams Secondary Plan (2007). Community members were very interested in finding a planning tool to maintain the look of a hamlet setting in a rural

countryside. The external planning consultant hired by the Town of Halton Hills for the development of the Hamlet of Glen Williams Secondary Plan (2007) introduced the hamlet buffer concept and it was incorporated as a key element of the 2007 hamlet secondary plan.

Residents always understood that the Hamlet Buffer could not be retroactively applied to existing built lots, but they expected that new subdivisions within or adjacent to the hamlet boundary would be required to implement it.

Development areas likely to be affected were:

- Sheridan/Meadows in the Glen, bordering the east hamlet boundary against Sheridan Farms
- Charleston Bishop Court Phase 2, bordering the north hamlet boundary and 'Spence's farm', east of Confederation
- Pilutti/Rinaldi Doracin Glen Williams Estates, bordering the north hamlet boundary, west of Confederation
- Desol Eden Oak Creditview Hts/The Chase bordering the south boundary along the 'Rail Trail'
- Devins Eden Oak Meagan and McMaster, bordering the north hamlet boundary and 'Stull's farm' between 8th Line and Oak Ridge Drive

Because of the significant change in the Provincial and Regional planning environment since the 2007 Plan's original approval the scoped review of the Secondary Plan was undertaken in 2019 to consider updated policies and technical studies, as well as further input from the community.

[file:///C:/Users/joany/Downloads/211004%20FINAL%20REPORT%20-%2000f54950a61966411e380dd73839188e4_Glen_Williams_OPA_44_for_Secondary_Plan%20\(1\).pdf](file:///C:/Users/joany/Downloads/211004%20FINAL%20REPORT%20-%2000f54950a61966411e380dd73839188e4_Glen_Williams_OPA_44_for_Secondary_Plan%20(1).pdf)

Subsequently, key revisions to the Glen Williams Secondary Plan (2021) Hamlet Buffer section were made by the Town of Halton Hills.

The Hamlet Buffer Policy has been modified based on public and agency comments regarding the need for the hamlet buffer associated with future development to be conveyed to the Town or other public body and contain trails circling the hamlet when possible. The updated policy states that 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. 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. In addition, public ownership of the Hamlet Boundary Buffer within New Planned Areas shall be required.

<https://pub-haltonhills.escribemeetings.com/filestream.ashx?DocumentId=11218>.

The Region of Halton also suggested "...comments related to ensuring a consistent approach to buffers have been addressed in the context of Glen Williams by allowing appropriate buffers to be determined through the required Environmental Impact Assessment process." Glen Williams Secondary Plan Report NO. PD-2021-0039.pdf

The GWCA and Glen residents did not and do not support the current substantially reduced 2021 buffer requirements as outlined in the GWSP, OPA 44 – H. 4.3.6 Hamlet Boundaries and Buffers. A range of five to ten meters, reduced from 20 meters, provides a greater degree of flexibility only for the benefit of the developers and at the expense of existing and new residents. The result of this change is to weaken the intent of the buffer and reduced lot line set back.

H 4.3.6 HAMLET BOUNDARIES AND BUFFERS The boundaries of the Hamlet shown on Schedule H4-1 have been previously determined based upon a limited amount of growth that: maintains Hamlet scale and character; corresponds to available wastewater servicing capacity and identifiable features such as roads, property boundaries, physical features and other logical boundaries. 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 Glen Williams Association fully supports the need for the ownership of buffers to be conveyed to the Town in order for them to remain public open spaces. There is past history with Meadows of the Glen where the town allowed for buffers to be considered easements. It is apparent that this method failed drastically in protecting the designated lands. Town of Halton Hills staff and interested developers must work collaboratively with the Glen Williams Community Association to seek creative solutions and to create buffers, without requiring developers to give up any acreage used for lot/home yield.^[1] This may mean some new homeowners would not get a lot as wide or as deep as other lots, but this would allow all residents to maintain a green naturalized hamlet buffer.

It is acknowledged that each of the planned areas for development are unique parcels of land. It is also acknowledged that a situational approach will be required using data from the science-based reviews of an Environmental Impact Assessment. However, the approach to the implementation of hamlet buffers for future developments should match the spirit and intent of the overarching goal of the GWSP OPA 44 “...to protect and preserve the natural and cultural heritage features of the Hamlet.”

^[1] An example of how such a compromise to a buffer might work has already been established in a Glen Williams development. The Glen Williams Community Association, hamlet residents, the Town and the Delsol/Eden Oak Creditview Heights (developer of The Chase) worked collaboratively in an attempt to balance the needs of all stakeholders and the integrity of the GWSP. Many neighbours of the new Chase Property were concerned because of the close proximity of the new lots lines to their older lot lines which meant that it was possible that the existing tree canopy could be lost. The developer was able to generate the maximum lot yield on all of the developable land acreage. The Town and the developer agreed in turn to section off a rear portion from each of these lots and dedicate them to the Town as a green treed strip of land in public ownership. What this compromise did was create a green buffer, without forcing the developer to give up any of his acreage in a way that might affect his lot count.

Statement Conclusion

It is in the best interest of the public, the Town and the Region that this plan remains intact and is applied as approved for all future development applications.

Allowing developers to further weaken the plan, after such significant public and professional input, will have considerable negative impacts on the unique character and natural and cultural heritage features of the Glen.