PLANNING JUSTIFICATION REPORT

PROPOSED CONFERENCE FACILITY
IN EXISTING NIGHTCLUB/BAR
530 GUELPH STREET

CLIENT:
HALTON MANAGEMENT

PREPARED BY:

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1.0 BACKGROUND

Robert Russell Planning Consultants Inc. has been retained by Halton Management Inc., to prepare a Planning Justification Report reviewing the Planning Policies and matters related to a proposed change of use for the existing structures on 530 Guelph Street, in the Hamlet of Norval, Town of Halton Hills. The purpose of the change in use is to allow the use of the entire building as a single commercial premises as defined in the Zoning By-law.

The Subject Property is located on the south side of Guelph Street (Highway 7), slightly east of Adamson Street, as shown in Figure 1: Site Context and Aerial Photograph. The east property limit is on the east side of the Credit River, with the river running through the Subject property. There are no man-made structures on the portion of the Subject Property that is east of the Credit River. The parcel is generally rectangular in shape with an area of 2.67 ha, frontage of approximately 156 m and depth of 195 metres. The property is relatively flat with the exception of the Credit River bed, and the slope up to Guelph Street at the front lot line.



Figure 1: Site Context and Aerial Photograph

The Credit River floodplain heavily impacts the Subject Property extending across most of the site, inclusive of the access driveway to Guelph Street. More details regarding the physical extent of the floodplain are provided in the Functional Servicing and Stormwater Management Report (FSR/SWM) prepared by C.F. Crozier & Associates Inc. dated July 2025 and submitted as part of this application package. Reference will be made to the FSR/SWM throughout the analysis of the applicable policies in this Planning Report

The Subject Property is located within a mixed use, hamlet community. Surrounding properties are include residential, institutional, open space, and commercial uses. The wider neighbourhood context includes agricultural uses, natural areas, and a cemetery.

The Subject Property currently contains a listed heritage resource, originally constructed as the Riviera Club in 1961. The building is described as a mid-century modern pavilion designed by John Ma. The Riviera Club operated as a social club hosting local events and formal entertainment. Subsequent uses of the building include as a health club, which involved the construction of an indoor pool in a new building to the southwest of the 1961 structure, and as a bar/nightclub. More detailed information regarding the history of the structures and the site is provided in the Cultural Heritage Impact Assessment (CHIA) prepared by MacNaughton Hermsen Britton Clarkson Planning Limited (MHBC) dated May 2025 and submitted as part of this application package. Reference will be made to the CHIA throughout the analysis of the applicable policies in this Planning Report.

The Norval Secondary Plan was originally developed in the early to mid 2000's. General community opinion at the time was that there was a desire to prevent the establishment of large commercial uses, that were out of scale with the existing hamlet. The community felt that larger businesses would impair the small town, rural character and historical context of the hamlet. This concern elicited much discussion during the public engagement meetings with respect to how to fairly regulate new businesses.

The resulting approved Secondary Plan limits the Gross Floor Area (GFA) of new commercial businesses to 500 m^2 whereas the existing structures on the Subject Property are a combined 1,393 m^2. At the time of passage of the Secondary Plan, the Subject Property was being operated as a bar/nightclub and was entitled to legal non-conforming status. However, eventually the bar/nightclub operations ceased and sufficient time elapsed that the legal non-conforming status was lost.

As such, the existing structures cannot currently be used for any commercial businesses, unless they were heavily modified to create individual units less that are less than 500 m^2 each. Furthermore, the Zoning By-law is slightly more restrictive in that it limits non-residential uses to 500 m^2 per lot rather than per premises, which would prevent the existing structure from being renovated into multiple units, despite that option being in conformance with the Secondary Plan.

2.0 DEVELOPMENT CONCEPT

Halton Management Inc. desires to use the existing 960 m^2 facilities as a conference centre, with rentals to private and public groups for meetings and events. There will be no change to the extent of the existing developed site, as can be seen in Figure 2: Conceptual Site Plan, although there will be some improvements to parking surface, parking layout, landscape areas, and building facade. Overall the changes to the parking area have made a minor reduction in the impervious area as compared with the existing condition.

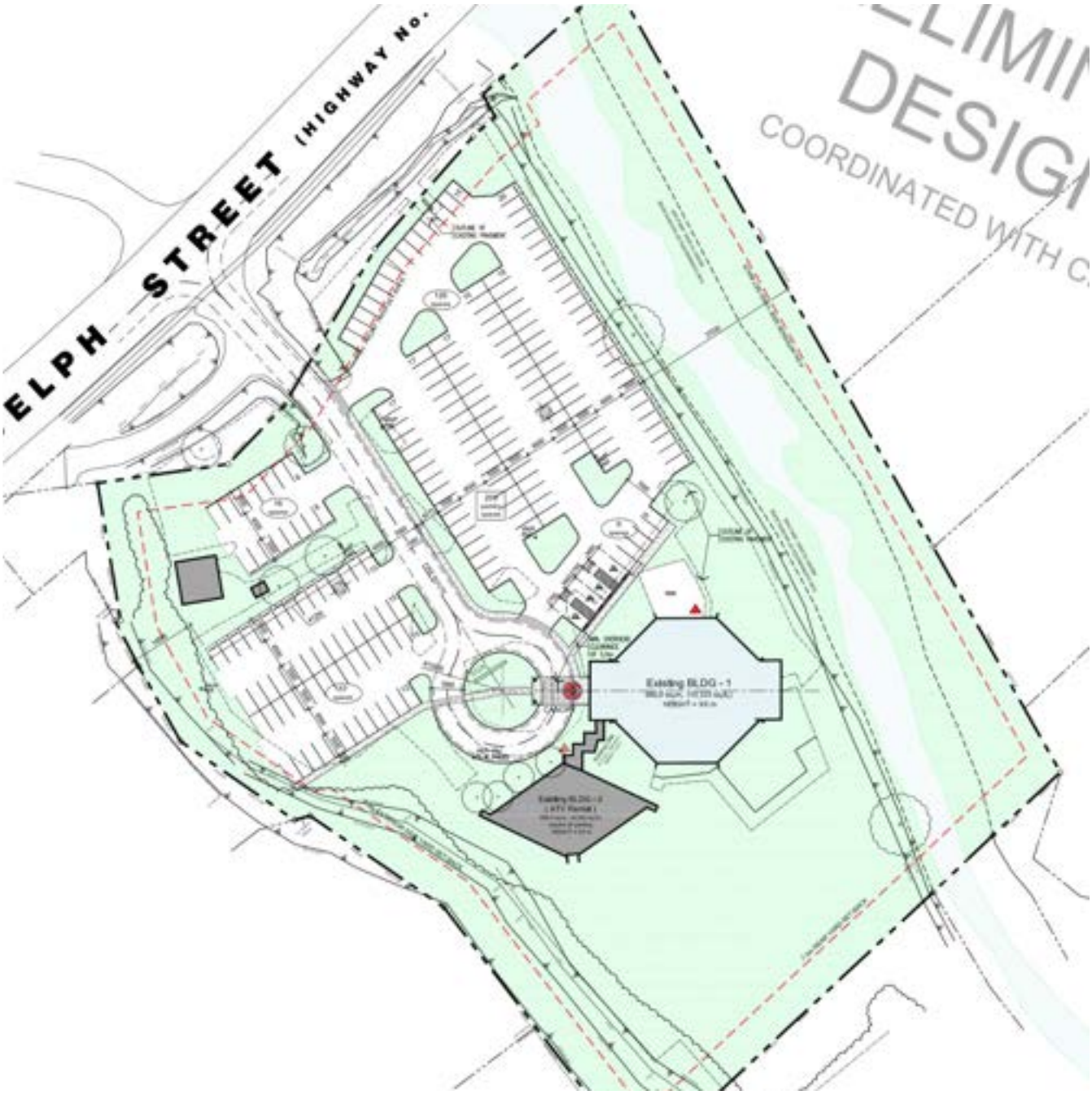


Figure 2: Conceptual Site Plan

Due to the GFA limits imposed on commercial businesses in the Hamlet of Norval, through the Norval Secondary Plan, which were also enshrined in the Regional Official Plan, and Town of Halton Hills Zoning By-law, an Official Plan Amendment and Zoning By-law Amendment will be required to permit the proposed reuse of the mid-century modern pavilion.

3.0 PLANNING POLICY

Given the nature of the proposed development, which will maintain the existing development limits and physical improvements to the site, and will introduce a new use that is consistent with the previous uses of the Subject Property, the policy analysis provided in this report will focus mostly on the request to increase the GFA limit. However, given the location of the Subject Property and proximity to natural features, some brief analysis of other relevant policies is also provided.

3.1 PLANNING ACT OF ONTARIO

As will be discussed in greater detail below, the nature of this Official Plan Amendment and Zoning By-law Amendment application on initial review may appear to be inconsistent with certain individual policies in the various applicable Provincial, Region and Town policy documents. As such, it is important for this Planning Report to include a brief discussion of the Planning Act and the directives it gives to an approval authority.

Section 2 of the Planning Act sets out the matters of provincial interest that a municipal council or local board, *"shall have regard to"*. The key matters in this list are:

"2(a) the protection of ecological systems, including natural areas, features and functions;"

Although the Subject Property is in close proximity to a number of natural features and ecological functions, there will be no new negative impacts to these systems, as there is no proposed increase in the developed area or intensity of use.

"2(d) the conservation of features of significant architectural, cultural, historical, archaeological or scientific interest;"

As noted above, and described in detail in the Cultural Heritage Impact Assessment, the original 1961 mid-century modern pavilion is listed on the Town's heritage register and the assessed heritage value may be sufficient to warrant designation under the Ontario Heritage Act. Conservation of heritage buildings is dependent on the ability to continue to use them. The existing GFA restrictions in the Official Plan and Zoning By-law prevent a viable commercial business from occupying the heritage building, and conflict with this matter of Provincial Interest.

"2(g) the minimization of waste;"

Halton Management Inc. is making use of an existing commercial building, with heritage value, that may otherwise sit vacant and neglected. As such, the preservation of this building is dependent on the ability to operate a viable commercial business within the premises.

"2(0) the protection of public health and safety;"

The floodplain for the Credit River extends across most of the Subject Property, including across the site access, as more fully detailed in the Functional Servicing and Stormwater Management Report prepared by Crozier. Section 7.2 of the Crozier report suggests that proposed use of the Subject Property is consistent in terms of extent and intensity as the previously permitted uses. Stormwater modeling indicates that the flood depth across the site access may exceed the typically acceptable limit, however, the building includes

a second floor that will provide safe refuge. Furthermore, no habitation is proposed on the Subject Property, and it is unlikely that events will occur on the site during a storm with sufficient intensity to cause flooding.

3.2 PROVINCIAL PLANNING STATEMENT 2024

The Province of Ontario released a new Provincial Planning Statement (PPS) revising some previous policies that were in the former Provincial Policy Statement, incorporating new policies, including some that were previously contained within the Growth Plan for the Greater Golden Horseshoe, which has now been repealed, with exception to certain sections that are referenced in the Greenbelt Plan or Oak Ridges Moraine Conservation Plan. The general intent of the 2024 PPS policies appears generally consistent with the previous 2020 version of the Provincial Policy Statement, The new 2024 Provincial Planning Statement is to apply to all land use planning decisions after October 20, 2024.

Several policies in the PPS support the proposed commercial operations and reuse of the heritage building at 530 Guelph Street.

The Vision for the Province, as outlined in Chapter 1 of the PPS, indicates that cultural heritage resources provide people a sense of place. The 64 year old heritage building could be argued to be part of the identity of the Hamlet of Norval, representing a modern contrast to the typically older, more traditional dwellings in the community.

"2.1.6 Planning authorities should support the achievement of complete communities by:
a) accommodating an appropriate range and mix of land uses,...and other uses to meet long-term needs;..."

The proposed conference centre would re-establish commercial uses on the Subject Property, and provide a type of land use that is generally unique to Halton Hills. Although there are other facilities that offer meeting rental space, we are currently unaware of a location in the Town with the capacity that is achievable at the Subject Property. Furthermore, the physical setting and context of the Subject Property enhances its uniqueness and desirability for such uses.

"2.3.1.2 Land use patterns within settlement areas should be based on densities and a mix of land uses which:
a) efficiently use land and resources;..."

The proposed introduction of a new commercial use in the existing heritage resource satisfies the above policy.

"2.3.1.3 Planning authorities shall support general intensification and redevelopment to support the achievement of complete communities..."

Redevelopment is defined in Chapter 6 of the PPS as *"the creation of new units, uses or lots on previously developed land in existing communities,..."* Although the proposed conference centre could be considered to be simply re-establishing a previous commercial use, through the lens of Planning Policy and the Zoning By-law it is classified as a new use. As such, the proposed conference centre would meet the above policy as it is a "new" use on previously development land in an existing community.

"2.8.1.1 Planning authorities shall promote economic development and competitiveness by:

a) providing for an appropriate mix and range of employment, institutional, and broader mixed uses to meet long-term needs;
b) providing opportunities for a diversified economic base, including maintaining a range and choice of suitable sites for employment uses which support a wide range of economic activities and ancillary uses, and take into account the needs of existing and future businesses;..."

The proposed conference centre introduces an underrepresented land use in the Town of Halton Hills and will increase the diversity and range of employment options for the Hamlet and the broader area. The Subject Site is ideal for the proposed use, as it already contains a structure that is suitable for such use, minimizing waste related to demolition or new construction, and reducing the land needs for new development.

"2.9.1 Planning authorities shall plan to reduce greenhouse gas emissions and prepare for the impacts of a changing climate through approaches that:…
e) take into consideration any additional approaches that help reduce greenhouse gas emissions and build community resilience to the impacts of a changing climate."

The opportunity to reuse existing built resources will have a substantial and positive impact on the potential climate impacts for the proposed use. By avoiding the need to construct a new building, the climate impacts related to the concrete, lumber and construction industries are nearly eliminated. Furthermore the proposed refinements and reconstruction of the parking area will provide a modest reduction in hard surface, pervious area, improving the stormwater characteristics of the Subject Property. This is discussed in more depth in Sections 4 and 5 of the FSR/SWM Report.

"3.3.1 Planning authorities shall plan for and protect corridors and rights-of-way for infrastructure, including transportation, transit..."

Provincial Highway 7 (Guelph Street) abuts the north side of the Subject Property and provides access to the Property. There is no new proposed construction that would impact any future need for widening or rebuilding of the bridge over the Credit River. Furthermore, there is a surplus of parking on the Subject Property, and if there was a need for a widening in the future, the first row of parking could be removed and the entire site would only be deficient by 3 parking spaces. It is likely those spaces could be accommodated elsewhere on the Subject Property without the need to apply for relief from the Zoning By-law.

"3.6.2 Municipal sewage services and municipal water services are the preferred form of servicing for settlement areas to support protection of the environment and minimize potential risks to human health and safety…."

The Subject Property is currently serviced with municipal water, as there is a watermain available under Guelph Street. However, the Hamlet of Norval is not currently serviced with municipal sanitary sewers, and all properties require individual septic systems, or the equivalent. Halton Management Inc. would welcome the opportunity to connect to a municipal sanitary sewer if one was made available. Until such time as full services are available, the Subject Property will continue to use and maintain the existing septic systems on site in accordance with Policies 3.6.4 and 3.6.5 of the PPS.

"4.1.1 Natural features and areas shall be protected for the long term."

The proposed development will not result in the loss of any natural features or otherwise degrade their function. The development footprint, after the restoration of the parking area will be smaller than the existing and historic footprint. Furthermore, the proposed landscaping strategy will seek to improve the quality of stormwater runoff. These factors, individually and together, may result in a minor improvement to the quality of stormwater runoff that enters the Credit River.

"4.1.8 Development and site alteration shall not be permitted on adjacent lands to the natural heritage features and areas identified in policies 4.1.4, 4.1.5, and 4.1.6 unless the ecological function of the adjacent lands has been evaluated and it has been demonstrated that there will be no negative impacts on the natural features or on their ecological functions."

"4.2.2 Development and site alteration shall be restricted in or near sensitive surface water features and sensitive ground water features such that these features and their related hydrologic functions will be protected, improved or restored, which may require mitigative measures and/or alternative development approaches."

As discussed throughout this report, the Proposed Development is merely a re-purposing of an existing building, and restoration and rehabilitation of the parking and landscape areas. Although these activities meet the definition of development and site alteration as they require an application under the Planning Act, they also represent an existing condition and will not create any negative impacts to the natural features or surface water features. As noted above, and discussed in greater detail in the EIS prepared by SLR, the greatest chance of impact is from the construction work to restore the parking area. Section 7.0 of the EIS provides a number of recommendations to mitigate any potential impact from construction. These recommendations are primarily focused on Erosion and Sediment Control measures and timing of construction.

"4.6.1 Protected heritage property, which may contain built heritage resources or cultural heritage landscapes, shall be conserved."

"4.6.3 Planning authorities shall not permit development and site alteration on adjacent lands to protected heritage property unless the heritage attributes of the protected heritage property will be conserved."

The purpose of the Planning Act applications is to allow for an existing heritage resource to be conserved. The existing structure cannot legally be used per the restrictions in the Official Plan and Zoning By-law, without substantial modifications to create smaller, individual units within the existing structure. That potential option would have substantial negative impacts on the heritage value of the structure. As such, the in order to conserve the heritage resource, the Official Plan and Zoning By-law must be amended to allow for a commercial business in the Hamlet of Norval to exceed the 500 m^2 limitation on Gross Floor Area.

"5.1.1 Development shall be directed away from areas of natural or human-made hazards where there is an unacceptable risk to public health or safety or of property damage, and not create new or aggravate existing hazards."

"5.2.2 Development shall generally be directed to areas outside of:…

b) hazardous lands adjacent to river, stream and small inland lake systems which are impacted by flooding hazards and/or erosion hazards; and..."

"5.2.3 Development and site alteration shall not be permitted within:…

c) areas that would be rendered inaccessible to people and vehicles during times of flooding hazards, erosion hazards and/or dynamic beach hazards, unless it has been demonstrated that the site has safe access appropriate for the nature of the development and the natural hazard; and..."

The Credit River floodplain extends across most of the Subject Property and affects the safe egress in the case of a flood. However, this is an existing condition and does not "create new or aggravate existing hazards." As the nature of the proposed use is consistent with the previously approved, and historical uses, this also can be considered an existing condition in that Halton Management Inc. is not proposing a greater intensity of use than what previously existed. Furthermore the operations will be at limited times of the day, and no accommodations or habitation is proposed. As such, staff and patrons of the establishment, will have ample opportunity to immediately evacuate the site should flooding conditions be present.

Given the above examples, and a review of the remaining policies within Chapters 2, 3, 4, 5 and 6 of the 2024 PPS, we are of the opinion that the proposed development is consistent with the policies related to Building Homes, Sustaining Strong and Competitive Communities, Infrastructure and Facilities, Wise Use and Management of Resources and Protecting Public Health and Safety.

3.3 GREENBELT PLAN

The Greenbelt Plan was originally released in 2004. It has been updated and revised a number of times since then. The most recent update is dated May 2017 and came into effect July 1, 2017.

Schedule 1: Greenbelt Area identifies the Subject Site as being within the Protected Countryside designation and Norval is designated as a Hamlet. Hamlet boundary limits are not mapped in the Greenbelt Plan, and shown as symbols only. In accordance with Section 1.4.2 of the Greenbelt Plan, the Greenbelt Plan policies and mapping defer to the appropriate Municipal Official Plan for delineation of the land uses and extents of all Settlement Areas. As more thoroughly discussed in Section 3.6 TOWN OF HALTON HILLS OFFICIAL PLAN, Schedule H2 of the Halton Hills Official Plan shows the Subject Property within the Hamlet boundary.

The Protected Countryside goals as described in Section 1.2.2 of the Greenbelt Plan can be generally summarized in the following categories:

- Protect and enhance agricultural viability (Section 1.2.2.1)
- Environmental Protection (Section 1.2.2.2)
- Recreation and Tourism (Section 1.2.2.3)
- Settlement Areas that can support the surrounding rural economy (Section 1.2.2.4)
- Required Infrastructure and the management of Natural Resources (Section 1.2.2.5)
- Addressing Climate Change (Section 1.2.2.6)

Section 1.4.1 of the Greenbelt Plan indicates that the Plan must be read in conjunction with other Provincial Plans, legislation and regulations. Although the Growth Plan has been repealed by the Province, the Greenbelt Plan does make some references to the Growth Plan, and as such, Section 3.4 GROWTH PLAN

FOR THE GREATER GOLDEN HORSESHOE provides an analysis of the applicable sections of the Growth Plan as required by this section. Section 1.4.1 makes reference to the 2019 version of the Growth Plan for the Greater Golden Horseshoe as it read immediately before it was revoked.

Section 1.4.3 indicates that lands within a settlement area will be subject to the applicable Official Plan.

Section 3.2.5 of the Greenbelt Plan describes Key Natural Heritage Features and Key Hydrologic Features and provides policies for development in proximity to them. The Credit River appears to meet the requirement to be considered a Key Hydrologic Feature. However, as in policy 3.4.4.1, and in keeping with Section 1.4.3 Hamlets are not subject to the policies in Section 3.2.5 of the Greenbelt Plan.

> *"3.3.2 The Province should, in partnership with municipalities, conservation authorities, non-government organizations and other interested parties:...*
> *2) Encourage the development of a trail plan and a co-ordinated approach to trail planning and development in the Greenbelt..."*

The Credit Valley Conservation Authority along with their municipal partners and with funding from the Province and the Greenbelt Foundation, have developed a Credit Valley Trail strategy. Ultimately, this trail will be 100 km long, but currently has a number of gaps, including the section through Norval, south of Guelph Street. Through the future Site Plan or Site Alteration process, Halton Management Inc. is willing to discuss the potential for creating a trail linkage through the Subject Property to help CVC and the Credit Valley Trail Foundation complete the trail system.

> *"3.4.4.1 Hamlets are subject to the policies of the Growth Plan and continue to be governed by official plans and related programs or initiatives and are not subject to the policies of this Plan, save for the policies of sections 3.1.5, 3.2.3, 3.2.6, 3.3 and 3.4.2…."*

Given the above examples, and a review of the remaining policies in section 3.1.5, 3.2.3, 3.2.6, 3.3, and 3.4.2 of the Greenbelt Plan, we are of the opinion that the proposed development is consistent with the intent of the policies for the Protected Countryside as the proposed development consists primarily of recognizing the historical uses of the Subject Property and allowing similar uses to be re-established.

3.4 GROWTH PLAN FOR THE GREATER GOLDEN HORSESHOE

The Province of Ontario repealed the Growth Plan for the Greater Golden Horseshoe (Growth Plan) on October 20, 2024, when the new PPS came into effect. However, despite this repeal, the Growth Plan is still in effect when it is referenced by the Greenbelt Plan. This was established through Amendment 4 to the Greenbelt Plan on August 15, 2024. Although Section 1.4.1 of the Greenbelt Plan notes the 2019 version of the Growth Plan, it also states *"as it read immediately before before it was revoked."* An office consolidation version of the 2019 Growth Plan was issued in August of 2020, and is used in the analysis below.

The Built Boundary of the Growth Plan is not delineated for rural settlements such as hamlets and villages. However, rural settlements do not contain any part of the Designated Greenfield Area as per the definition in Section 7 of the Growth Plan. As such, Rural Settlements are their own category exclusive from the built up area and designated greenfield areas. Rural Settlements are defined in Section 7 to include all settlement areas that are identified as hamlets in the Greenbelt Plan. Therefore, because Norval is identified as a Hamlet in the Greenbelt Plan it is also defined as a Rural Settlement in the Growth Plan.

Section 2.1 provides the narrative context for the policies that guide where and how to grow in the Growth Plan and states that *"It is important to optimize the use of the existing urban land supply as well as the existing building and housing stock to avoid over-designating land for future urban development..."* The concept of using or re-using existing buildings in order to avoid having to build new or expand urban areas is given a prominent position in the introductory section of the Growth Plan, highlighting the importance of this concept. The proposed development is aligned with this goal.

> *"2.2.5.1 Economic development and competitiveness in the GGH will be promoted by:*
> *a) making more efficient use of existing employment areas and vacant and underutilized employment lands..."*

The Subject Property would not meet the definition of *employment area* in the Growth Plan. However, it does provide a small amount of additional commercial employment on lands that have historically been used for similar purposes and will comply with the intent of this policy.

> *"3.2.5.1 In planning for the development, optimization, or expansion of existing and planned corridors and supporting facilities, the Province, other public agencies and upper- and single-tier municipalities will:...*
> *b) ensure that existing and planned corridors are protected to meet current and projected needs in accordance with the transportation and infrastructure corridor protection policies in the PPS..."*

As discussed in Section 3.2 PROVINCIAL PLANNING STATEMENT 2024 regarding Section 3.3.1 of the PPS, the Highway 7 corridor will be protected.

> *"4.2.7.1 Cultural heritage resources will be conserved in order to foster a sense of place and benefit communities..."*

The purpose of the development applications for the Subject Property is to allow the existing cultural heritage resource to be preserved through a re-use of the structure. Without a feasible way to re-use the building, it is likely that the resource will be lost through neglect.

> *"4.2.9.1 Municipalities will develop and implement official plan policies and other strategies in support of the following conservation objectives:..."*
> *d) integrated waste management, including through:…*
> *iii. Promotion of building conservation and adaptive reuse..."*

Although this policy is directed to municipalities to guide their Official Plan policies, the proposed development conforms with the intent of the policy.

Generally, the remaining sections and policies of the Growth Plan address matters related to housing and employment areas, focusing on urban expansions, and infrastructure and those parts of the natural heritage system that are external to settlement areas and are not applicable to the Subject Property or the proposed development. The Proposed Development will not provide any housing or would it be considered to be an Employment Area, and the majority of the policies in the Growth Plan are not applicable. Therefore it is our opinion that in consideration of the limited examples above, and a review of the remaining policies within Sections 2, 3, 4, and 5 of the Growth Plan for the Greater Golden Horseshoe 2020, we are of the opinion

that the proposed development is consistent with the policies related to growth, infrastructure and protection of natural systems.

3.5 REGION OF HALTON OFFICIAL PLAN

The Halton Region Official Plan was initially approved in 2006 and has been amended a number of times since then. The November 4, 2022 office consolidation, as amended, of the Halton Region Official Plan was reviewed in preparation of this report. Subsequent to the November 4, 2022 consolidation, Bill 150 introduced a number of further modifications, which were also considered in the analysis below. It should be noted that the Region of Halton no longer has Planning Responsibility, and there will be no further amendments to the Halton Region Official Plan (HROP). Instead, the Town of Halton Hills currently has the responsibility to interpret and enforce the HROP policies, and it is anticipated that the HROP will be phased out at the time of the next Municipal Comprehensive Review of the Official Plan by the Town of Halton Hills.

Map 1 – Regional Structure, confirms the Subject Property is within the Hamlet boundary, and designates most of the property as Regional Natural Heritage System (RNHS), with a small area in the northwest corner is designated as Hamlet. The existing structures and most of the existing parking area fall within the RNHS designation.

Map 1G – Key Features within the Greenbelt and Regional Natural Heritage Systems, indicates that there are key features present on the Subject Property.

Map 3 – Functional Plan of Major Transportation Facilities, identifies Guelph Street as a Provincial Highway, and Adamson Street as a Major Arterial.

Policy 50.2(1) confirms that hamlets are considered to be settlement areas and is consistent with the Provincial planning framework.

Policy 52(3) provides guidance on interpreting the boundaries between differing land use designations, and also the limits of constraint areas. It indicates that where the boundaries are not well defined by physical features, parcel limits, or township lot and concession lines, will be the responsibility of the Region. However, given that the Region no longer has Planning Authority, it is surmised that this task falls to the Town to make the determination. The limit of the Regional Natural Heritage System and of the Key Features are not defined on site by physical features, nor are they aligned with the parcel boundaries or lot/concession lines, as such, these boundaries are subject to further review and confirmation by the appropriate approval authority.

Similar to the general approach of the Growth Plan, the policies in Part II of the HROP primarily address housing and employment targets, Regional phasing, and the overall Regional Structure, and aside from the policies noted above, are not applicable to the Proposed Development.

"57. Development is directed to environmentally suitable areas with the appropriate land use designation in accordance with the goals, objectives and policies of this Plan."

"58. Uses are permitted as specified for each land use designation provided that:
(1) the site is not considered hazardous to life or property due to conditions such as soil contamination, unstable ground or soil, erosion, or possible flooding;..."

As previously noted, the Subject Property contains a portion of the Credit River and is encumbered by its floodplain. Although this would suggest that development of the Subject Property would not be in conformity with the above policies, the overarching justification for the Proposed Development is that it would not negatively impact the Natural Heritage System, and would not require any new construction, development, or encroachment into any hazardous lands or natural heritage features. Rather it is merely the reuse of an existing building for uses consistent in nature and intensity to the historic uses of the Subject Property. The reuse of the cultural heritage resource is consistent with other policies in the HROP, in particular Policy 165, and represents a situation where some HROP policies conflict with other HROP policies. Given that the EIS from SLR indicates that there will be no negative impact to the natural system, and that the SWM report from Crozier indicates that the flooding hazard will not impact public safety, the intent of Policies 57 and 58 are met.

"89. It is the policy of the Region to:…
(21) Prohibit the extension within the Region of urban services beyond the boundaries of the Urban Area, with the following exceptions:…
(c) The Hamlets of Norval and Glen Williams when the Region, in consultation with the Town of Halton Hills, considers it prudent and feasible to provide such services…."

There is an existing watermain on Guelph Street that provides municipal water to the Subject Property, however, the Hamlet of Norval is not currently serviced by municipal sanitary sewers. Halton Management Inc. welcomes the eventual extension of full municipal services and a sanitary sewer connection to the existing wastewater pumping station at the west end of the Hamlet.

"103. Hamlets are compact rural communities designated to accommodate future residential growth in the rural area and small scale industrial, commercial and institutional uses serving the farming and rural communities. The range of uses permitted in Hamlets are in accordance with the policies of this Plan and approved Area-Specific Plans for Hamlets…."

"106. It is the policy of the Region to:…
(2) Apply the following conditions to development within Hamlets:
a) Development shall conform to the approved Area-Specific Plan for the Hamlet, relevant policies of this Plan,..."

The Proposed Development is a small scale commercial use in an existing building, and these factors are consistent with the policies quoted above and most of the policies of the HROP. However, the proposal is based on a land use that is not currently permitted in the Norval Secondary Plan and will require an Official Plan Amendment to include conference centres as a use. Upon approval of that Official Plan Amendment, the Proposed Development will be in compliance with the above policy.

"114. The goal of the Natural Heritage System is to increase the certainty that the biological diversity and ecological functions within Halton will be preserved and enhanced for future generations."

As the Proposed Development will make use of existing buildings and site alterations, there is no new encroachment into or near the Natural Heritage System, furthermore the EIS prepared by SLR has indicated that there will be no negative impact on the Natural Heritage System, thus ensuring its continued

preservation. As such, although the Proposed Development may be within the Natural Heritage System, it is in compliance with the above goal.

"114.1 The objectives of the Natural Heritage System are:

(1) To maintain the most natural Escarpment features, stream valleys, wetlands and related significant natural areas and associated Cultural Heritage Resources….

(4) To direct developments to locations outside hazard lands.

(5) To protect or enhance the diversity of fauna and flora, ecosystems, plant communities, and significant landforms of Halton.

(6) To protect or enhance Key Features…

(7) To protect or enhance fish habitats….

(9) To contribute to a continuous natural open space system to provide visual separation of communities and to provide continuous corridors and inter-connections between the Key Features and their ecological functions.

(10) To protect significant scenic and heritage resources…."

As noted previously, the Proposed Development maintains the existing condition of the Subject Property and due to the reduction in paved area and proposed enhanced landscape plantings may serve to enhance Credit River and its associated fish habitat. Furthermore the existing continuous natural open space provided by the Credit River Valley will be similarly maintained without modification. Although the Subject Property is impacted by the floodplain for the Credit River and is considered to be a hazard land, the public safety implications are limited and can be mitigated, as previously discussed. Policy 114.1(10) mentions *"heritage resources"* but does not indicate if those are natural heritage resources or cultural heritage. Regardless of the intended meaning, the Proposed Development will protect both the natural heritage and cultural heritage resources of the Subject Property.

Policy 115.3(1)(d) indicates that Significant Woodlands are to be categorized as Key Features, and 115.3(1)(e) indicates that Significant Valleylands are also categorized as Key Features none of the other elements listed in Policy 115.3(1) are present on or in vicinity of the Subject Property. The Credit River Valley has been determined to meet the definition of a Significant Valleyland as it provides an important ecological function and contributes to the quality and diversity of the area, in accordance with the PPS definition. Significant Woodlands have been mapped by the Region of Halton on abutting properties to the west and south.

Policy 115.3(5) indicates that watercourses within a Regulation Limit are also considered to be part of the Regional Natural Heritage System. The Regulation Limit is defined in part by the extent of the floodplain, and as such, this criteria would also apply and provide guidance regarding what aspects of the Proposed Development could result in potential impacts. However, this policy applies to the watercourse itself and not the floodplain.

Policy 115.4(2) builds upon the previous policies and clarifies the floodplain is also considered to be part of the Regional Natural Heritage System.

Although Policy 116.1 provides a mechanism to refine the limits of the Regional Natural Heritage System based on detailed studies or impact assessments, the Official Plan Amendment application does not seek to modify the limit of the Regional Natural Heritage System, but to recognize the historic uses of the Subject Property and create policies that would permit similar uses to be re-established. Although it could be argued that the developed portion of the site, containing the structures and paved areas, does not provide an

ecological benefit as part of a valleyland and perhaps the Significant Valleyland classification should not apply to the developed part of the Subject Property. In which case, the Subject Property would still be part of the Regional Natural Heritage System, but the proposed uses would not be within a Key Feature.

> *"117.1 Subject to other policies of this Plan, applicable policies of the Greenbelt Plan and Niagara Escarpment Plan, and applicable Local Official Plan policies and Zoning By-laws, the following uses may be permitted:…*
> *(3) existing uses...*

For existing uses to qualify under the policy above, they need to meet the definition of existing uses as provided in Policy 234. This definition states that the use had to be legally established prior to the adoption of the above policy. The Region of Halton Official Plan definition does not require the existing use to have been continuous to maintain its status of an existing use. As such, under the HROP, it appears that the previous uses could be re-established without an amendment to the HROP. Under the HROP, land uses are defined and categorized broadly, as such, to apply this policy, the existing use would be that of Hamlet. As such, non-residential uses greater than 500 m^2 in GFA should be allowed on the Subject Property as of right in the Region of Halton Official Plan.

> *"118 It is the policy of the Region to:…*
> *(2) Apply a systems based approach to implementing the Regional Natural Heritage System by:*
> *a) Prohibiting development and site alteration within significant wetlands, significant coastal wetlands, significant habitat of endangered and threatened species and fish habitat except in accordance with Provincial and Federal legislation or regulations;*
> *b) Not permitting the alteration of any components of the Regional Natural Heritage System unless it has been demonstrated that there will be no negative impacts on the natural features and areas or their ecological functions…*
> *(3) Require the proponent of any development or site alteration that meets the criteria set out in Section 118(3.1) to carry out an Environmental Impact Assessment (EIA),...*
> *(6) Encourage the development of trails within the Regional Natural Heritage System provided that:...*
> *(11) Require that Local Zoning By-laws prohibit new construction and the expansion or replacement of existing non-conforming uses within hazard lands..."*

The Proposed Development would not alter significant wetlands, significant coastal wetlands, significant habitat of endangered or threatened species and fish habitat. Furthermore there are no proposed alterations to the Regional Natural Heritage System.

SLR has provided an EIS to meet the requirements for an EIA as stated above.

Halton Management Inc. is open to discussions with the Town and CVC regarding the Credit Valley Trail and a potential linkage through the Subject Property in accordance with the above.

The Development Proposal does not seek to reconstruct, expand, or otherwise replace the existing heritage structure. As such, any limitation in the Local Zoning By-law that exactly implements Policy 118(11) would not necessarily apply to the matter at hand.

"139.3.7 It is the policy of the Region to:
(1) Prohibit development or site alteration within the Key Features of the Greenbelt Natural Heritage System, except in accordance with policies of this Plan…."

Section 3.2.2.4 of the Greenbelt Plan confirms that the Greenbelt Natural Heritage System does not extend into, or otherwise apply to existing settlement areas. As such, by virtue of the Subject Property being within the boundary of the Hamlet of Norval, there is no component of the Greenbelt Natural Heritage System on these lands and the above policy is not applicable.

There are a number of other HROP policies that repeat the same themes and requirements as the policies discussed above, such as the Environmental Quality policies requiring an Environmental Impact Assessments, or the requirement to maintain or enhance fish habitat, which are already required by the policies that speak to the Regional Natural Heritage System. These similar or repetitive policies are not specifically discussed in this report, however, the analysis provided above would apply to those omitted policies.

"145. It is the policy of the Region to:…
(10) Encourage the protection and enhancement of watercourses and headwaters areas as an integral component for maintaining natural hydrological processes within a watershed…."

The restoration and reconstruction of the existing parking area provides an opportunity to reduce the total paved area and increase the amount of landscaping that can help improve the quality and reduce the quantity of stormwater runoff that enters the adjacent Credit River in accordance with the above policy.

"148. The objectives of the Region are:...
(4) To promote among residents, consumers and businesses in Halton the concept of a conserver society that is based on the prudent, efficient and sustainable use of the earth's resources and the principles of reduce, reuse, recycle and resource recovery….
(6) To promote the environmental, social and economic benefits of resource conservation and recovery…."

The re-use and re-purposing of existing building stock is the same concept as consumer reuse and resource conservation, but on a larger scale. Given the challenges associated with the GFA limitations, and the uniqueness of the building, it is unlikely that a collection of feasible business ventures could be found that could utilize the building in keeping with the current as of right zoning. As such, the best option for preserving the cultural heritage resource and preventing it from becoming neglected, abandoned, and eventually requiring demolition and transfer to a waste management facility is to allow non-residential uses greater than 500 m^2 such as the Proposed Development.

"165. The goal for Cultural Heritage Resources is to protect the material, cultural and built heritage of Halton for present and future generations."

The approval of the Planning applications that would permit the Proposed Development would protect the cultural heritage resource present on the Subject Property and help the Region meet their Cultural Heritage Resource goal.

"170. It is the policy of the Region to:…
(14) Monitor the opportunities and constraints on future expansion of existing businesses within Halton, and, within the policies of this Plan, promote the growth of these businesses within Halton….
(16) Promote Halton as a tourist and recreational destination for both its own residents and outside visitors based on the following themes:
a) scenic beauty..."

Although the proposed conference centre is not an existing business, it is proposed to be located within an existing building and Policy 170(14) could be similarly applied as the arbitrary 500 m^2 limit on non-residential uses is a constraint, particularly considering the proposed use is to be located within an existing structure that exceeds the arbitrary limit.

We are not aware of any current dedicated conference centres within Halton Hills. There are rentable rooms and facilities that can provide opportunities for small events. However, the existing heritage structure on the Subject Property has a unique setting within a hamlet with a long history, and a scenic location within the Credit River Valley. Conference facilities are themselves a type of tourist destination, depending on the nature of the event and organizer that has rented the facility. The historic and natural setting, within proximity of the GTA and a major international airport, should be strong marketing features to attract event organizers and will help bring event attendees into the community, with associated carry over impacts for the local economy when attendees patronize other local businesses. These carry over impacts would benefit gas stations, restaurants, accommodation and retail stores.

Based upon our review of the entirety of the Halton Region Official Plan (2006) as amended, including the specific policies referenced above, we conclude that the proposed development conforms to the Halton Region Official Plan.

3.6 TOWN OF HALTON HILLS OFFICIAL PLAN

The Town of Halton Hills Official Plan (THOP) was originally adopted in 2008 and has been amended a number of times since then. The April 30, 2024 consolidated version, as available for download from the Town's website was used in the analysis below.

Schedule A1 – Land Use Plan, indicates the Subject Property is within the Hamlet of Norval, and indicates that reference should be had to Schedule H2.

Schedule H2 – Norval Land Use Plan, designates the portion of the Subject Property on the west side of the Credit River as Hamlet Community Core Area. The Subject Property that is located east of the Credit River is designated as Greenlands. This schedule also shows an overlay on the Subject Property to indicate the presence of the Regulatory Floodplain. On the west side of, and adjacent to, the Credit River, is a dashed line representing a High Priority Trail System.

Section A2 of the Official Plan identifies the Town of Halton Hills goals and objectives to guide growth and land use in the municipality. Several of these goals align with the proposed development of a conference centre in an existing heritage building with no new site alteration or construction.

- A2.1.1 To protect, enhance and where possible restore, significant natural heritage features and related ecological functions in the Town for present and future generations.
- A2.6.1 To identify, conserve and enhance the Town's cultural heritage resources and promote their value and benefit to the community.
- A2.7.1 To provide opportunities for economic development in a manner that fosters competitiveness and a positive business environment.
- A2.11.1 To promote community development in a manner that is sustainable for present and future generations.

Section A3 indicates that there three broad categories of land uses in the Town; Environmental and Open Space; Urban Area, and; Agricultural/Rural Area. Given that the majority of the Subject Property is designated as Hamlet Community Core Area, which is part of the Agricultural/Rural category, and not as Greenlands, indicates that the Town does not believe the developed area of the site contains significant natural heritage or open space features. As such, the analysis of policies related to natural heritage and open space will be limited to potential impacts that the Proposed Development would have on adjacent areas that are considered to be significant natural areas. This is consistent with direction provided in Section B1.2.4 which states that no development will be permitted on *"adjacent lands"* unless an EIS is approved by Council.

Furthermore, although the portion of the Subject Property on the east side of the Credit River is designated as Greenlands, there is no proposed development in this location, and the Credit River forms a barrier for any potential impacts from the Proposed Development on the east side of the river. In light of this, a discussion of the Greenlands policies, except in recognition of adjacent lands, are not required to evaluate the Proposed Development.

The main body and schedules of the THOP indicates that there are two Greenlands designations: Greenlands A, and Greenlands B. However, Policy B1.2.1 provides an alternative approach that can be used when preparing Secondary Plans. The Norval Secondary Plan takes such an approach and only identifies a single category of Greenlands.

Section C1 provides the Town's Environmental Management Objectives and includes the following relevant matters:

- a) recognize watercourses in the Town and protect them through the planning process from development that may have an impact on their function as an important component of the Natural Heritage System;
- b) ensure that development does not occur on lands that are unstable or susceptible to flooding;
- j) protect water resources as an integral component of the natural environment;
- m) encourage the regeneration of natural areas near watercourses;
- s) identify means for ensuring that new development is built in a more sustainable manner, including the implementation of Green Development Standards.

The Credit River bisects the Subject Property, and a majority of the site is susceptible to flooding. Despite this, the EIS from SLR and FSR/SWM report from Crozier have found that there are no new impacts related to the ecological function of the river, or to the hydraulic regime or public safety. This is primarily because there is no new construction proposed and the Proposed Development represents an existing and historic condition. Furthermore, the rehabilitation of the parking area provides an opportunity to make some marginal improvements, to both the public safety and ecological function of the flood hazard and river ecosystem. Generally, the most sustainable strategy for development is the opportunity to reuse existing built stock. As the premise of the Proposed Development is to make use of an existing structure, and existing parking area, with a use that is consistent in function and intensity as the previous and historical uses, it can be considered to be a sustainable development.

Section C2 provides guidance for the provision of Environmental Impact Studies, and was taken into consideration by Town of Halton Hills staff during the discussions with SLR related to the terms of reference for the EIS study that is being submitted in support of these applications. The EIS has also taken into consideration the policies provided in Section C3.2 regarding watercourses.

Despite the general restriction on development within a floodplain as provided in C4.1, Section C4.2 provides limited opportunity for minor additions or replacements within a floodplain, subject to the requirements of the conservation authority. Although there is no new construction proposed, and this policy is not directly applicable, it does indicate that the Town recognizes that there are existing situations where historic development patterns may not conform with current policies. The Subject Property was previously developed for a use that is consistent in type and intensity with the Proposed Development. As such, given the fact that the THOP includes policies that could allow for new development in the form of a building addition, it stands to reason that the THOP would also be interpreted to allow for the potential reuse of the existing structures and site improvements.

Section C8 states that *"All commercial, industrial, institutional, recreational and residential development proposals shall be supported by a Stormwater Management (SWM) report…."*. The FSR/SWM report prepared by Crozier is provided in accordance with this policy.

It doesn't appear that Section C19 – Green Development includes the consideration of building reuse as a sustainable development principle. However, LEED version 5 (current version) evaluation criteria related to Building and Materials Reuse (MRc1) does state that the reuse of existing buildings, subject to certain criteria, is a valid sustainability consideration. Points are available for LEED evaluated projects that reuse whole buildings. As such, despite the Green Development section of the THOP, nor the Town's Green Development Standards, including specific policies related to the reuse of existing buildings, the Proposed Development complies with the intent of the Green Development policies.

Although the Subject Property is considered to be within the Protected Countryside as identified in Section 3.3 GREENBELT PLAN3.3 GREENBELT PLAN above, it is not designated as Protected Countryside in the THOP, which is reflective of the Greenbelt Plan Policy 3.4.4.1 which limits the applicability of the Protected Countryside policies within Hamlet boundaries. As such, Section E2 of the THOP is not applicable to the Subject Property.

Objective E3.1(c) indicates that the Town desires to *"provide opportunities for small-scale commercial and tourism related uses that are compatible with the character and scale of the Hamlets"*. The resulting policies that are intended to implement this objective limit commercial uses to a maximum of 500 m^2 per premise, however as more fully described below, there is no limit on the size of the building or structure that contains

the business. The analysis below will demonstrate that despite the proposed OPA that seeks to increase the allowable size of a business premise, the Proposed Development will meet this objective.

Policy E3.3.6 provides the GFA limit noted above, and indicates that a proposed non-residential use may require a Hydrogeological study to be submitted. By combing the GFA limit and the requirement for a Hydrogeological study in the same policy infers that the rationale for this size limit is the ability to adequately service the non-residential use in terms of sanitary treatment. However as noted in Section 1.0 BACKGROUND there was public discourse during the creation of the Norval Secondary Plan regarding the prevention of larger retail or commercial businesses that would be out of character for the Hamlet. It stands to reason that a building and use that existed at the time of the adoption of the Norval Secondary Plan was part of the community character, and as such, would not be out of place today. The existing building is connected to three existing septic systems, with a rated capacity of 40,000 L/day as per the Environmental Compliance Approval. Section 3.2 of the FSR/SWM report by Crozier has calculated the potential sewage flow for the conference centre use and estimate that at 27,000 L/day, which is substantially less than the existing, designed, approved and constructed capacity. This is primarily due to the lower occupancy and sanitary sewage flows expected for a conference centre as compared with a bar/nightclub use.

Work is currently ongoing to determine the condition of the existing septic systems. If new or reconstructed systems are required, those would be subject to MECP requirements.

> *"E.3.3.7 Where a proposed non-residential use abuts or is in close proximity to an existing residential use, fencing, landscaping or berming, or a combination of these features shall be utilized to ensure that there is adequate screening between the uses."*

Adjacent residential uses are currently screened by existing natural vegetation along the west side of the Subject Property. This vegetation is identified as part of the Regional Natural Heritage System on Map 1G of the HROP.

Section E.3.4.2 lists the permitted uses in the Hamlet Community Core Area and conference centres are not included as a permitted use. This is not unexpected as a conference centre is a more intense use than other traditional hamlet uses. However, Norval is not a typical hamlet, and has a long history of more intense uses focused on the Subject Property and the property located immediately to the north across Guelph Street. A detailed history of the construction and past uses of the Subject Property is provided in the Heritage Impact Assessment prepared by MHBC and included in support of this application. In summary, the site has always been a commercial operation that hosted a large number of people, whether as a social and dance club, health club, and in later years, as a bar/nightclub. The property on the north side of Guelph Street was previously home to the Hollywood Hotel and was originally built in the 1800's. According to historical accounts the Hollywood Hotel was a busy place, in particular during a period of time when neighbouring Peel County prohibited the sale of alcohol. Norval's location adjacent to the County boundary made the Hollywood Hotel the easiest and closest opportunity for Peel County residents to obtain alcohol. Although the Hollywood Hotel was destroyed in a fire in 1993, it was rebuilt and reopened as a bar and restaurant and continued to function in that capacity until the 2000's.

Urban Design policies are provided in Section F2 of the THOP. Although the Hamlet of Norval is not considered to be an Urban Area as per the rest of the THOP policies, it appears that there is an exception for Urban Design. The Rural Design policies of Section F4, specifically excludes Hamlets and Rural Clusters, which suggest that these areas are considered to be Urban for the purposes of Urban Design.

In light of the fact that the Proposed Development does not propose any new construction, these policies are generally not applicable to the building itself. Furthermore, it should also be considered that the Proposed Development seeks to reuse an existing heritage building, and as such, it is not appropriate to evaluate the heritage attributes of the existing building against the Urban Design policies.

Although the no new structures or reconstruction is proposed, the parking lot will be rehabilitated within the current extents. As such, the following private realm Urban Design policies can be considered in relation to the proposed parking lot changes.

> *"F2.2.2.1(b) Site design shall address compatibility between differing adjacent land uses in context of density, height and massing through appropriate site layout, building locations and landscape treatments."*

The Subject Property has existed in the same general configuration for several decades, as such, it could be considered to be compatible in its current arrangement. Additionally, most of the site design elements should not, or cannot be moved or redesigned, with the exception to the refinements to the parking and landscape areas. In that regard, the parking area will be slightly reduced, without loosing capacity, with a more formal layout. The landscape areas will benefit from this reduction to the parking area. The closest differing adjacent land uses are to the west, and are screened by dense existing vegetation.

> *"F2.2.2.2.1(c) The design of sites adjacent to parks, woodlots and watercourses shall be sensitive to these features. In these instances, appropriate setbacks shall be maintained between buildings and sensitive natural areas, while on-site landscaping shall be well integrated with natural areas."*

Similar to the previous policy, the Proposed Development represent an existing condition with the site layout and setbacks already established. However, the rehabilitation of the parking area provides an opportunity to slightly increase the distance between Credit River and the paved surfaces, and allow for additional vegetation adjacent to the river and interspersed throughout the parking lot.

> *"F2.2.2.1(d) Continuous, highly visible, well-articulated and landscaped connections between building(s) and the street should be provided to establish appropriate pedestrian linkages between the sidewalk and building entrances, and generally improve access for public transit users."*

As illustrated on the Site Plan prepared by BJC Architects, the rehabilitation of the main access driveway is proposed to contain a continuous sidewalk along the east side and a continuous landscape strip a minimum of 4.0 m in width beside the sidewalk.

> *"F2.2.2.4(a) Landscaping is a major contributor to a vibrant streetscape. A high quality of landscape design shall be required to enhance the visual aesthetics of development and to enhance the site and land use compatibility."*

Guelph Street is a Provincial Highway, and is at an elevation approximately 4 m above the existing parking lot. Due to the grade differential, the MTO has wider Right of Way (ROW) adjacent to the Subject Property which limits the ability for landscaping immediately adjacent to Guelph Street. Furthermore, the drop in grade results in most of the lot frontage being out of the line of sight of drivers and pedestrians on the north side of the road.

"F2.2.2.4(c) Where appropriate, planted landscaping strips and fencing shall be used to buffer development from adjacent uses..."

As noted above, there is a landscape area along the west property limit that is comprised of naturalized vegetation and provides a robust buffer to the adjacent uses.

"F2.2.2.4(f) Vehicular entrances often present opportunities for landscaping that highlight entry points into the site. Therefore, appropriate landscaping shall be provided on either side of driveway entrances, particularly at the main entrances."

Due to the grade challenges and the wider ROW at the site entrance any landscape features that are located on the Subject Site will not serve to highlight the entry point as they would be 4 m below the road and approximately 30 m offset from the Guelph Street curb.

"F2.2.2.4(h) Landscaping can play an important role in delineating a site's side yards and often provides a visual break in large asphalted areas. In this regard, landscape strips planted with trees and/or shrubs and flowers shall be used to separate each development and the associated parking areas."

A landscape plan will be prepared to accompany the future Site Plan or Site Alteration application. The landscape strips and islands through the parking area of larger and more frequent than the existing condition, providing more opportunity for landscape planting beds in accordance with this policy.

"F2.2.2.5(b) Where surface parking areas are situated adjacent to a public street in the front yard, their layout should be subdivided into smaller areas to avoid large monotonous asphalt surfaces. In these cases, a certain percentage of the frontage should be reserved for landscaping between the buildings and the street line. The parking areas may be partially buffered and/or screened from the street through the use of landscaping, tree planting, pedestrian facilities, lighting, fencing and/or other landscape elements in order to enhance the visual aesthetics of, and pedestrian activity within, such parking areas."

The extent of the parking area is generally consistent with the existing condition, however, as previously noted the rehabilitation of the parking lot allows for some improvements through the reduction in paved surface and increase in landscape areas. However, it is not possible to fully comply with this policy and still provide the parking as required by the Zoning By-law.

Site access and circulation sidewalks are provided in accordance with Policies F2.2.5(c) and F2.2.5(d) of the THOP.

"F2.2.2.6(a) All signs shall be in accordance with the Town's Sign By-law and designed as an integral element of the site layout and/or building design that does not dominate the overall development character. Signs on designated heritage properties or within Heritage Conservation Districts pursuant to the Ontario Heritage Act are encouraged to be compatible with the architecture and character of the property or district."

These is an existing pylon sign at the frontage of the Subject Property that was constructed at least several decades ago based on personal memory. At this time Halton Management Inc. intends to refurbish and

reuse the existing signage pylon and structure. During the refurbishment, the Norval Hamlet Design Guidelines section X5.8 will be reviewed for applicability.

"F2.2.2.6(c) All lighting shall be internally oriented so as not to cause glare on adjacent properties or public roads. Outdoor lighting fixtures that reduce energy consumption and direct light away from the night sky shall be encouraged."

The Subject Property contains existing pole mounted parking lot lighting. This lighting will be replaced as part of the parking lot rehabilitation, to be subject to detailed design and review during the future Site Plan or Site Alteration process. Consideration will be given to the Norval Hamlet Design Guidelines section X5.7 during this process.

F2.2.2.8(b) To ensure safety and promote their priority over vehicular traffic, major pedestrian routes on the site should be identified and delineated with paving materials that differentiate them from the driving surfaces. Pedestrian walkways should be made continuous across driving aisles as well as across driveway entrances at the street. The use of soft landscaping is also encouraged along major pedestrian routes."

The conceptual Site Plan prepared by BJC shows a continuous sidewalk from Guelph Street to the building with an adjacent soft landscaping strip in accordance with this policy.

"F2.2.3 Development shall be designed to be compatible with, and complementary to, existing natural heritage features."

The Subject Property is adjacent to natural heritage features, primarily to the south, but also a narrow strip of woodland to the west and the Credit River to the east. However, the Proposed Development represents the re-establishment of a previous land use, rather than new construction, as such, relationship between the developed portion of the site and the surrounding natural heritage area has already been established and will not change.

"F2.2.4 Development shall be designed to incorporate, conserve and enhance identified cultural heritage resources as distinct elements and/or focal points, and incorporate these features into the overall site and building design."

This policy is the primary reason for the Proposed Development. Halton Management Inc. wishes to incorporate the existing cultural heritage resource as the proposed conference centre. Making it not only the focal point, but the entire reason for the project.

Unobstructed views are provided from Guelph Street to the existing building, and throughout the parking lot, in accordance with the safety Policies of F2.2.5.

Barrier free access will be reviewed at the time of the Site Plan or Site Alteration applications, and also at the Building Permit stage in accordance with the requirements for identified cultural heritage resources that may apply at that time.

There is an existing prominent view of the Credit River and Valley from the Guelph Street ROW across the Subject Property. This view will be preserved through the Proposed Development in accordance with Policy F2.2.8 of the THOP.

Section F5 states that *"It is the intent of this Plan that the Town's cultural heritage resources be identified, conserved and enhanced whenever practical..."* The Proposed Development seeks to preserve and enhance the cultural heritage resource on the Subject Property in accordance with this statement.

MHBC has prepared a Cultural Heritage Impact Assessment (CHIA) based on a terms of reference that was informed by Section F5.1.2 and endorsed by the Town's Heritage Planner. This CHIA is included with this submission in support of the proposed preservation of the cultural heritage resource as a conference centre.

> *"F5.1.6 It is the intent of this Plan to encourage the restoration or rehabilitation of significant cultural heritage resources by assisting with funding applications, establishing grant programs and creating special taxation districts. Council may also encourage the restoration and retention of heritage properties through the use of bonusing and density transfers and other means as permitted by the Planning Act. Council may lead by example by restoring, rehabilitating, enhancing and maintaining municipally owned cultural heritage resources, through appropriate heritage stewardship practices."*

It is clear based on the above policy and statement in intro to Section F5, that the Town values its cultural heritage resources. The draft Official Plan Amendment seeks two site specific exceptions from the policies in the Official Plan, and the Zoning By-law standards:

1. Permit a conference centre as a land use on the Subject Property
2. Allow a GFA of 960 m^2 for an individual non-residential premises

The second exception is consistent with the concept of *"bonusing"* as referenced in the policy above. Expanding the range of permitted uses, could also be considered to be bonusing with respect to land use permissions, as contrasted with density or size. As such, Council could support the proposed OPA in accordance with the above policy and comply with the Official Plan.

Policy F5.2.3 provides guidance for the Council to consider when contemplating the designation of a cultural heritage resource under the Ontario Heritage Act. The CHIA included with this application, suggests that the existing structure meets the criteria to be designated. It will be up to Town of Halton Hills Council whether or not to do so.

> *"F5.2.7 Council shall encourage the retention of buildings of significant cultural heritage and protected heritage structures in their original locations whenever possible. All options for on-site retention shall be considered before approval is given for relocation to another site. These options include: integration within new development areas, adaptive re-use of the building in its original location..."*

Given that the primary reason for the Official Plan Amendment to facilitate the Proposed Development is to retain an existing building with cultural heritage value, Council should consider *"all options"* to retain it, including it's re-use in the original location. The Proposed Development proposes just that, and the OPA and ZBA should be approved by Council in accordance with the above policy.

The overall goal of the Norval Secondary Plan as stated in Section H2.1 is *"to ensure the retention and enhancement of the natural, cultural and heritage resources of the Hamlet and to guide change so that it contributes to and does not detract from the character of the Hamlet, in an environmentally protective and*

cost effective manner." The Proposed Development will retain the cultural heritage resource on the Subject Property, by introducing a land use consistent with the historical uses of the site and heritage building. By re-using an existing built resource the Proposed Development is cost effective. Furthermore, because there is no expansion to the use or new construction proposed, the surrounding environmental features will not be impacted.

Policy H2.3.3 provides further detail regarding the GFA limits on non-residential uses and the need for a hydrogeological study. New non-residential uses are limited to 250 m^2 unless a Hydrogeological Study confirms that groundwater resources will not be impacted by the proposed private or partial services. As noted previously in this Section of the PJR, the Proposed Development has a lower estimated daily sewage flow than the previous uses and the systems that are in place and designed for those previous uses may be sufficient if determined that they are in good condition. Regardless of whether the existing systems need replacement or not, it is anticipated that a replacement system will be smaller, and as such, should meet the MECP requirements for protection of groundwater resources with the appropriate design.

Crozier has prepared a FSR/SWM that has been submitted with these applications and provides the Stormwater analysis in accordance with Policy H2.3.4 of the THOP.

Policy H2.3.5 states that *"Areas that have been identified as wetlands, significant woodlands, Environmentally Sensitive Areas (ESAs) or steep slopes, have been designated as Greenlands on Schedule H2….Developed lands whose only environmental constraint is the floodplain have been given an underlying land use designation with a floodplain overlay designation as outlined in Section H2.13 of this Plan."* The majority of the Subject Property, including the areas that are already developed with buildings and parking spaces is not designated as Greenlands, but as Hamlet Community Core Area with a Floodplain overlay, in accordance with this policy. No changes are proposed to this arrangement.

This policy continues with the following restriction on land use. *"In accordance with the Provincial Policy Statement and Credit Valley Conservation's Regulation 160/06….no new or expanded nursing homes, day care facilities, group homes, seniors homes, schools, fire, police or ambulance stations, or other sensitive uses shall be permitted within the regulatory floodline established by Credit Valley Conservation."* None of the listed sensitive uses are proposed as part of this application. The proposed use is consistent with the previously established uses, and will not create a public safety hazard if the Subject Property was to be inundated with floodwaters.

In addition to the above, the following relevant states are also included in Policy H2.3.5 *"An Environmental Impact Study may be required for development applications adjacent to the Greenlands to the satisfaction of the Town in consultation with the Region of Halton and Credit Valley Conservation Authority in accordance with Section C2 of the Town's Official Plan."* Please refer to the EIS prepared by SLR in accordance with this policy.

Policy H2.3.6 provides guidance related to expansions or replacements of existing buildings in the floodplain. Although the Proposed Development does not seek to expand or replace the existing buildings, some of the concepts provided in this Policy help demonstrate how the Proposed Development is in compliance with the intent of the THOP. In particular, the policy states that *"However, it is recognized that the existing buildings provide the homes and businesses that make up the community and are also important from a tourism and heritage preservation perspective."* The proposed conference center is consistent with the historic function and intensity of land use of the Subject Property, and should be recognized by the Town of Halton Hills as an opportunity to not only preserve the heritage of the Hamlet, but

also as a tourism draw for conference attendees that could be introduced to the other tourism and heritage attributes of Norval.

A few specific criteria are provided in Policy H2.3.6, that although not directly applicable to the proposal at hand, are useful for demonstrating the appropriateness of the Proposed Development.

- d) There are no dwelling units currently, and non are proposed
- e) Safe access is discussed in detail in the FSR/SWM prepared by Crozier. Although floodwater depth along the egress route exceeds the limits in the CVC policies, the existing mezzanine provides a safe refuge above the regulatory flood level, and it is anticipated that there will be sufficient notice of impending floodwaters that conference centre will be closed by facility management and attendees will be able to leave before the flooding depth exceeds the safe access limits

Although Policy H2.3.7 indicates that a 30 m development setback is required from the Credit River, it also indicates that because of historic development patterns, exceptions are permitted with appropriate mitigation and consultation with the CVC. No new development is proposed that would trigger this limitation, however, CVC has been consulted in preparation of the terms of reference for the EIS and an evaluation of potential impacts to the fish habitat within the Credit River is provided in Section 4.4 of the EIS. The EIS has recommended that erosion and sediment control measures be implemented during the parking lot rehabilitation to, in part, protect the Credit River and its fish habitat from construction related impacts. Please refer to Section 7 and 7.1 of the EIS for more detail.

Policy H2.3.14 provides Hamlet design policies that are intended to protect the character of Norval in recognition of the *"heritage buildings which shape the built form."* As previously noted in this section of the PJR, there is no new construction proposed and the built form design (Hamlet design) policies are not directly applicable. However, it should be noted that the Subject Site contains a heritage building that shapes the *"built form"* and defines the character of the Hamlet. The heritage value of the building, and its importance to the character of the Hamlet must be part of the evaluation of the Proposed Development.

Section H2.4.1 indicates that the purpose of the Hamlet Community Core Area designation is to *"define and strengthen the character of the Hamlet through the protection of its architectural style and natural heritage while at the same time supporting and improving the commercial viability of the existing businesses and tourism based activities."* The Proposed Development seeks to protect the existing architectural style represented by the heritage building, and to improve the tourism draw and commercial viability of the Hamlet.

Policy H2.4.2 provides the list of permitted land uses, and includes the restriction on GFA for non-residential uses. This list is generally consistent with that provided in Section Policy E3.2.4, with some additional refinements. Of note is that community centres are a permitted land use in Policy H2.4.2. Community Centres often provide overlapping functionality with conference centres as community centres typically provide rentable meeting rooms for meetings and events, similar to a conference centre's primary purpose. The Town of Halton Hills Zoning By-law 2010-0050 defines Community Centre as *"A building or structure operated by a public authority that is used for community activities and other activities such as recreational uses, trade show, weddings and banquets."* Trade shows, weddings and banquets, along with meetings, are the primary purpose for Conference Centres. As such, these events are already permitted within the current zone, but only if operated by a public authority. As such, the Proposed Development does not

substantially differ from other permitted land uses, except in the proposed Gross Floor Area, and in the ownership of the facility.

The required parking for the entire site, inclusive of the other uses on the Subject Property is 196 spaces, whereas 208 are provided. As such the Proposed Development complies with H2.4.3(b), with the exception of the location of the parking spaces, as the existing condition provides all of the parking in front of the building.

Site servicing has already been discussed above in relation to Policy H2.3.3 (and thus H2.3.1) and as such, also complies with H2.4.3(c).

The Proposed Development is consistent with the historic use of the Subject Property in character and scale, and as such, would comply with H2.4.3(e).

Section H2.13.1 confirms that the Floodplain overlay on the Subject Property is intended to identify properties that are subject to the CVC regulations and policies. The CVC has been consulted during the preparation of the supporting studies for these applications, and those studies are intended to demonstrated how the Proposed Development is consistent with those policies and regulations.

Based upon our review of the entirety of the Town of Halton Hills Official Plan (2008) as amended, including the specific policies referenced above, and also including the Norval Secondary Plan and design guidelines provided in the Appendices, we conclude that the proposed development conforms to the Town of Halton Hills Official Plan.

3.7 TOWN OF HALTON HILLS ZONING BY-LAW 2010-0050

The Town of Halton Hills adopted a new comprehensive Zoning By-law in July of 2010, which was partially approved by the Ontario Municipal Board in February 2011. The December 2020 office consolidation was used in the analysis below. There have been a number of amendments since the office consolidation was issued. Those amendments that are available on the Town's website have also been reviewed

Schedule A20 indicates that the property is split zoned partly consistent with the multiple land use designations in the Official Plan. The lands west of the Credit River, that are already developed with structures and parking areas is zoned Hamlet Commercial (HC). Most of the rest of the property is zoned as Environmental Protection One (EP1). However, there is a small area in the north west corner of the site that is zoned as Hamlet Residential One (HR1). The HR1 zoned area is where the large accessory building is located. No changes are proposed within the HR1 zone. The schedule also shows the Floodplain overlay over most of the HC zoned area.

The current list of permitted uses as provided in Table 9.1 does not include conference centre as permitted use in the HC Zone. Additionally, the 500 m^2 GFA limit on non-residential uses, as previously discussed, has been incorporated into the Zoning By-law standards.

To facilitate the Proposed Development, a site specific Zoning By-law Amendment will be required to add Conference Centre as permitted use, and to allow for a GFA of 960 m^2 reflecting the existing condition.

The following tables review the zoning conformity of the existing structures and the Proposed Development

Table 1: Accessory Building Standards

ZBL Reference	Description	HC Zone Standard	Provided (Existing Condition)	Complies with ZBL? (Yes/No)
Table 4.2	Accessory Building Location	Interior or Rear Yard	Front Yard	No
Table 4.2	Accessory Building Setback from Front Lot Line	No closer than main building	19 m and 26 m (Closer)	No
Table 4.2	Accessory Building Setback from Interior Lot Line	1.5 m	13 m	Yes
Table 4.2	Accessory Building Setback from Rear Lot Line	1.5 m	145 m	Yes
Table 4.2	Maximum Height for all other Accessory Buildings	4.5 m	Unknown	TBD
Table 4.2	Maximum Floor Area for all Accessory Buildings	60 m^2	95.5 m^2	No
Table 4.2	Maximum Floor Area per Accessory Building	40 m^2	86.7 m^2 8.8 m^2	No

The rows that are shaded gray in the table above identify the zoning deficiencies related to the existing accessory buildings. These accessory buildings have been in continuous use as storage facilities for the primary use since they legally existed. No changes are proposed to the previous and still existing use. As such, these structures should be considered to be legal non-complying structures and site specific relief is not being sought at this time to address these deficiencies.

Table 2: Lot and Primary Building Standards

ZBL Reference	Description	HC Zone Standard	Provided (Existing Condition)	Complies with ZBL? (Yes/No)
4.3(b)	Waste Storage Area	In main or accessory building	In main building	Yes
4.4(a)	Air Conditioner Location	Not Front Yard	Side Yard	Yes
4.4(b)	Air Condition Side Yard Setback	1.0 m	45 m	Yes
4.10	Floodplain overlay	No New Development with Conservation Authority Approval	Existing	Yes

ZBL Reference	Description	HC Zone Standard	Provided (Existing Condition)	Complies with ZBL? (Yes/No)
4.20	Non-conforming uses	Legally established and has been continuous	Legally established use and size, but ceased	No
Table 5.3	Parking Required - If use is considered Banquet Hall, or - If use is considered Convention Centre - ATV business - Accessory Buildings (storage)	 1 space / 5.8 m^2= 172 1 space / 20 m^2 = 50 1 space / 20 m^2 = 20 1 space / 30 m^2 = 4	 208, or 74	Yes
Table 5.4	Loading Space	1	1	Yes
Table 5.6	Bicycle Parking	2 spaces plus 1 space / 1,000 m^2 = 4	0	No
Table 9.2	Minimum Lot Frontage	30 m	155.7 m	Yes
Table 9.2	Minimum Lot Area	0.2 ha	2.67 ha	Yes
Table 9.2	Minimum Front Yard	7.5 m	96 m	Yes
Table 9.2	Minimum Rear Yard	7.5 m	49 m	Yes
Table 9.2	Minimum Interior Side Yard	4.5 m	20 m (west) 40 m (east)	Yes
Table 9.2	Maximum Height	11.0 m	Unknown	TBD

The gray shaded rows above in Tables 1 and 2 represent an existing condition that doesn't currently comply with the zoning by-law standards, but that will be in compliance with the preparation of the future Site Plan application. Specifically, bicycle parking is not currently provided on the site, but can be added to a formal site plan to ensure compliance.

The green shaded row represents the proposed site specific zoning by-law amendment. Specifically, the proposed Conference Centre is not a permitted use, and the existing building exceeds the maximum GFA for non-residential premises. As these zoning standards are also incorporated in the Official Plan policies, a thorough justification for why the proposed site specific exceptions are appropriate is provided in the preceding sections of this Planning Justification Report, and will not be repeated here.

Given the above examples, and rationale for the site-specific zoning amendments, we are of the opinion that the proposed development will be in conformance with Zoning By-law 2010-0050 upon implementation of the proposed Zoning By-law Amendment. Furthermore, the proposed Zoning By-law Amendment is consistent with the intent of the Region of Halton's Official Plan, the intent of the Town of Halton Hills Official Plan.

4.0 SUMMARY

The proposed Official Plan Amendment and Zoning By-law Amendment to permit the use of the existing built heritage structure at 530 Guelph Street will ensure that an identified cultural heritage resource is protected and preserved for future generations. The proposed amendments consist of only two changes: the addition of Conference Centre as a permitted use; the increase in the allowable GFA per premises to 960 m^2.

The increase is GFA is required simply because the existing building is larger than than the limit that was established in the Norval Secondary Plan and the Town of Halton Hills Zoning By-law and represents and existing condition. As such, and as described in this report, there are no anticipated impacts to the community due to the increase in GFA.

The addition of Conference Centre as a permitted use is partially reflective of the construction of the building and the layout of the site, which, from its inception, was always intended to host large groups of people. There are no other uses within the list of permitted uses for the HC zone that would require or benefit from a large building such as the heritage structure at 530 Guelph Street, with the exception of a Community Centre. However, a Community Centre must be operated by a public authority, and this property is under private ownership. There is considerable overlap between the types of activities permitted in a Community Centre as compared with the proposed Conference Centre, both can, and do, rent rooms for meetings, events, trade shows, weddings and banquets. The as of right zoning would permit these activities if a public authority was operating the facilities, and it is only because this will be a privately operated Conference Centre that the site specific zoning amendment is required.

As such, it is my opinion that the proposed site specific Official Plan Amendment and Zoning By-law Amendment represent good planning and are appropriate for the development of the Subject Property.

Yours Truly,

ROBERT RUSSELL PLANNING CONSULTANTS INC.



Rob Russell, MCIP, RPP
President