

PLANNING BRIEF

10097 REGIONAL ROAD 25

Halton Hills, ON



PREPARED BY

SHS

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PURPOSE

The purpose of this Planning Brief is to inform the Niagara Escarpment Commission (NEC) of the initial concept for this development and how it relates to the Niagara Escarpment Plan. The Planning Brief was developed following several meetings with NEC staff to discuss the site, its history, and how Niagara Escarpment Plan policies will apply. The intent is that circulation to other Authorities Having Jurisdiction and an ongoing conversation with the NEC will inform a final design. This will then be re-submitted with a complete Planning Justification Report fully addressing the design, Niagara Escarpment Plan policies, and any reports or studies which are commissioned in support of the Development Permit application.

BACKGROUND

The **Bob Rumball Canadian Centre of Excellence for the Deaf** (BRCCED) provides services and a place for Deaf people that recognizes their community, culture and language – sign language. For over 50 years, BRCCED's services have offered a variety of opportunities across the lifespan that allows the people they support and serve to flourish in an accessible and language rich environment. BRRCED has been in Halton Region since the opening of their first group home in 1968.

BRCCED would like to expand on their longtime presence in Halton Region with a world-class rural living campus that offers affordable and supportive homes to the Deaf community at 10097 Regional Road 25.

THE SITE

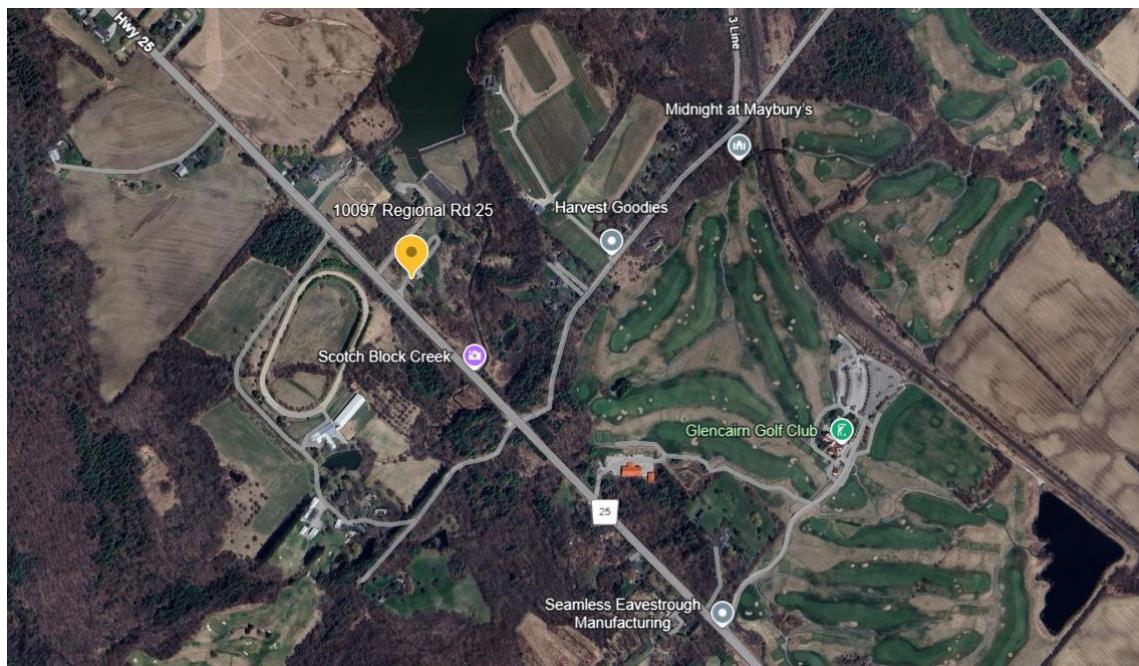


Figure 1: 10097 Regional Road 25 Context. Source: Google

The subject site is owned by BRCCED and located at 10097 Regional Road 25 in Halton Hills. It is comprised of one irregularly shaped parcel located on the east side of Regional Road 25. The site is approximately 8.8 acres and contains three existing buildings, including two single detached dwellings at the rear and one multi-residential building containing six units fronting onto Regional Road 25. The site is currently serviced by well and septic, which will need to be expanded to accommodate the new development.

The Subject Lands are surrounded by predominately rural and agricultural uses on all sides, including rural residential uses. The Glencairn Golf Club is located to the south of Side Road 10. Surrounding natural features include the Scotch Block Reservoir to the northeast, wetlands abutting the Subject Lands to the southeast, the Middle Sixteen Mile Creek along the eastern property line, and two small watercourses extending northwest over the Subject Lands from the Middle Sixteen Mile Creek. The majority of the Subject Lands are located within Conservation Halton's regulated area, floodplain hazard, and stable top of bank hazard area.

The Subject Lands are within the Niagara Escarpment Plan (NEP) area and fall under the jurisdiction of the Niagara Escarpment Commission. The northern portion of the Subject Lands, where the existing dwellings are located, is designated Escarpment Protection Area (EPA). The southern portion of the Subject Lands is designated Escarpment Natural Area, the most restrictive designation, providing the highest standard of natural area protection within the NEP. The EPA is intended to provide a buffer for natural areas and the Escarpment Natural Area. Within both Escarpment Protection Areas and Escarpment Natural Areas, there are a limited range of uses permitted such as existing uses, single dwellings, home occupations, bed and breakfast, conservation and natural/wildlife management uses.

There is no Zoning By-law that applies to this site, however it is expected that the Zoning By-Law of the Town of Halton Hills will form the basis of the Niagara Escarpment Commission's review of the project in terms of general policies which the NEP does not cover. The Town of Halton Hills, the Region of Halton, and Conservation Halton are commenting agencies who will review and provide comments on the Project's Development Permit application.



Figure 2: Naturalized area of the site

ENVIRONMENTAL CONSTRAINTS

Being in the Niagara Escarpment, and with a creek running through the lands, there are environmental constraints to development on the site. The site is designated as Escarpment Natural Area and Escarpment Protection Area under the Niagara Escarpment Plan.



Figure 3: NEP Designations on the subject lands.

The Escarpment Natural Area is a restrictive designation, largely excluding development. As a result, the development proposed by BRCCED is entirely within the more permissive Escarpment Protection Area designation, which allows for limited development that is sensitive to its natural surroundings and creates a natural buffer for the Escarpment Natural Area.

In 2021, BRCCED engaged GeoProcess Research Associates to investigate other environmental constraints and hazards on the site to determine the area that would be most suitable for development. Based on identified watercourses, driplines, wetlands, Conservation Halton Headwater Floodplain Hazard and appropriate buffers, an estimated net developable area of 0.88 hectares was established, as shown below:

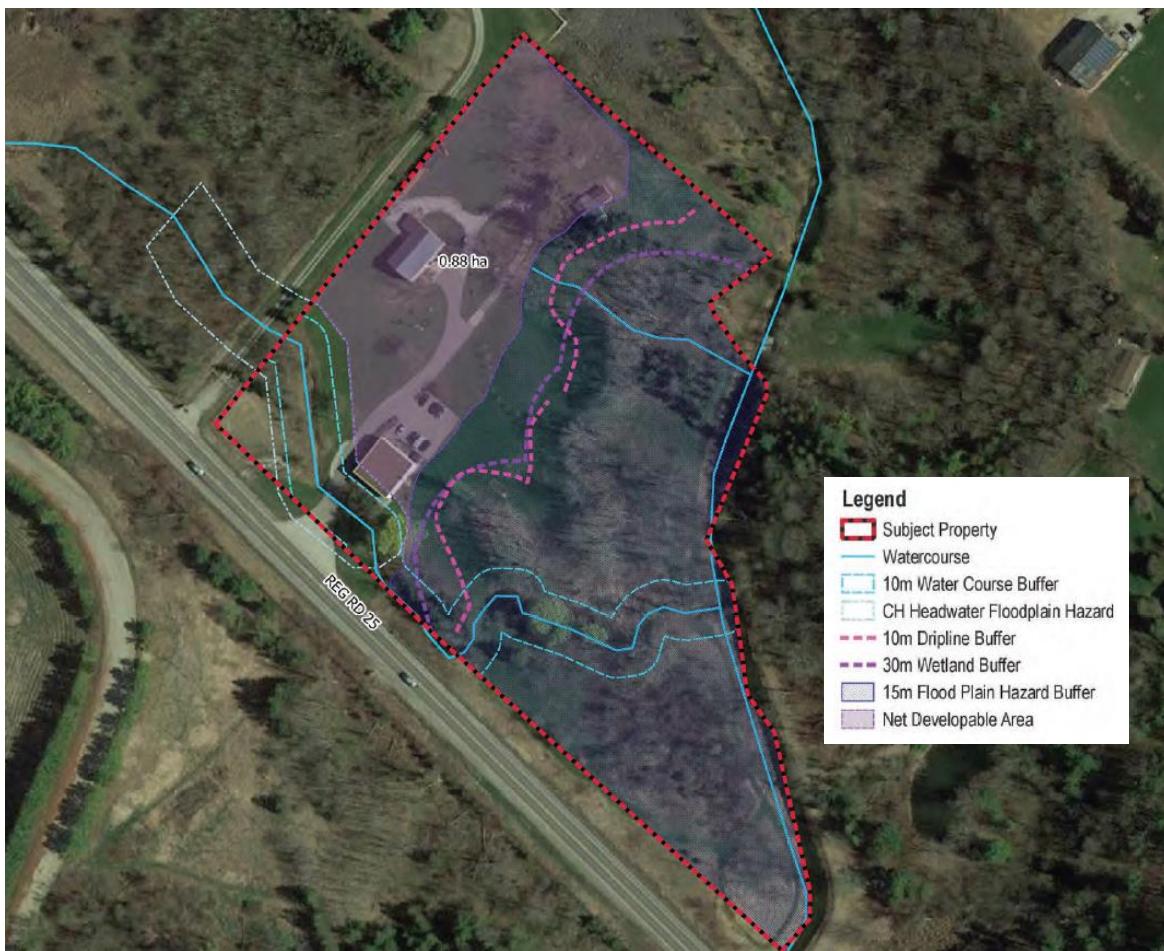


Figure 4: Environmental constraints and estimated Net Developable Area based on GIS mapping.

There is also a Stable Top of Bank (STOB) Hazard on the site, as identified in Conservation Halton's GIS mapping. The line of the slope is only an approximation based on available GIS mapping. BRCCED has engaged a geotechnical consultant to evaluate the STOB Hazard and determine its exact location. This investigation is currently underway and is expected to be complete by the end of July. Based on topographic mapping, the project team believes that the slope may be further out than indicated by Conservation Halton's GIS mapping. Additionally, Conservation Halton has identified that development outside of the STOB Hazard may be possible if mitigation measures against further erosion are implemented to their satisfaction. In light of this, the proposed development does infringe on the STOB Hazard, and will be refined based on the geotechnical analysis and through conversations with Conservation Halton once the application is circulated.



Figure 5: Stable Top of Slope (Blue) and Assumed Developable Area (Red)

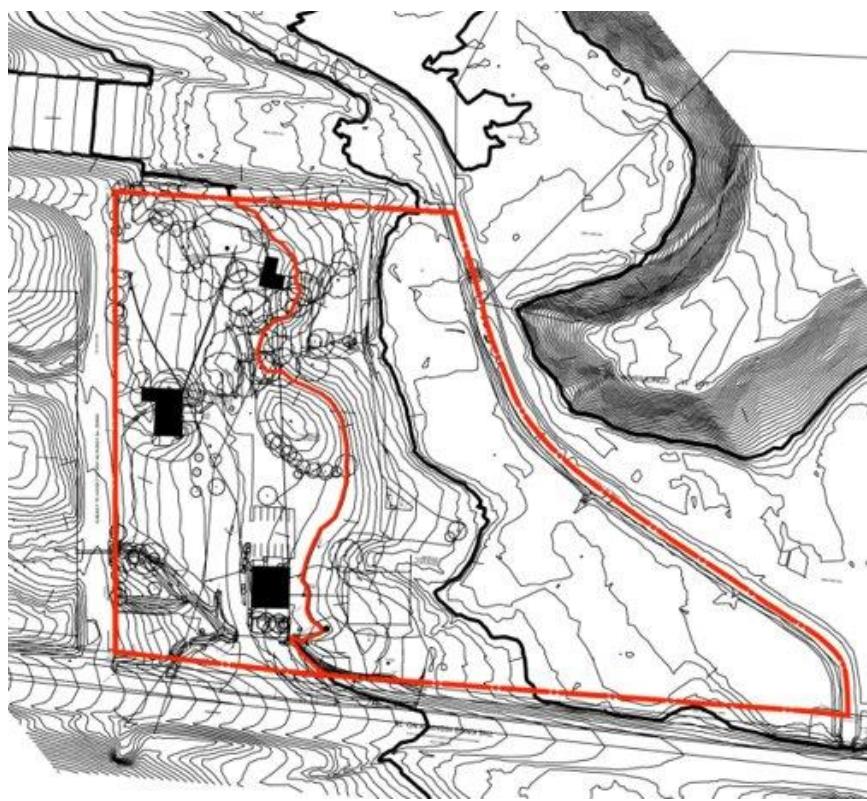


Figure 6: Estimated Stable Top of Bank based on Topographical Mapping

EXISTING BUILDINGS

There are currently three existing buildings on the site. All existing buildings are proposed to be demolished and replaced due to disrepair, flooding issues, and incompatibility with BRCCED's vision for the site and the NEP's policies.

	<p>Built: 1900 Formerly: Farmhouse Currently: Unoccupied dwelling in disrepair</p>
	<p>Built: 1945 Formerly: 4-unit apartment building (2 one-bedroom units, 1 two-bedroom unit and 1 three-bedroom unit) expanded to a 6-unit apartment building in 1996 (adding 2 one-bedroom units). Note that this represents a minor expansion of use intensity under Section 2.3.4. of the NEP (Hearing Office decision HO-95-40) Currently: a 6-unit apartment building with 3 units currently occupied</p>
	<p>Built: 1930 Formerly: Mushroom Barn Currently: Single dwelling; second floor in disrepair and vacant, first floor occupied by a residential tenant</p>

THE DEVELOPMENT PROPOSAL

BRCCED has engaged Unity Design Studio (Unity) as the Prime Consultant and Architect of Record on the project. Working with SHS and the NEC to understand the unique requirements of the site, Unity has proposed an initial concept plan which leans heavily on their experience providing unique and context-appropriate institutional buildings and sites in naturalized and rural areas.



Figure 7: Precedent projects used as design inspiration for the proposed development

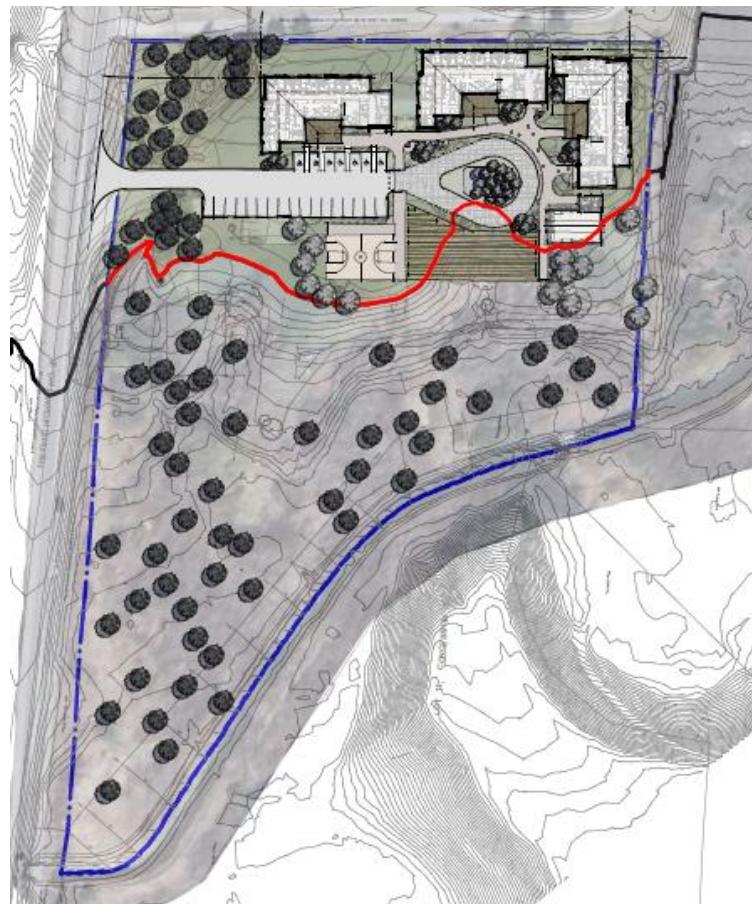


Figure 8: Overall site plan

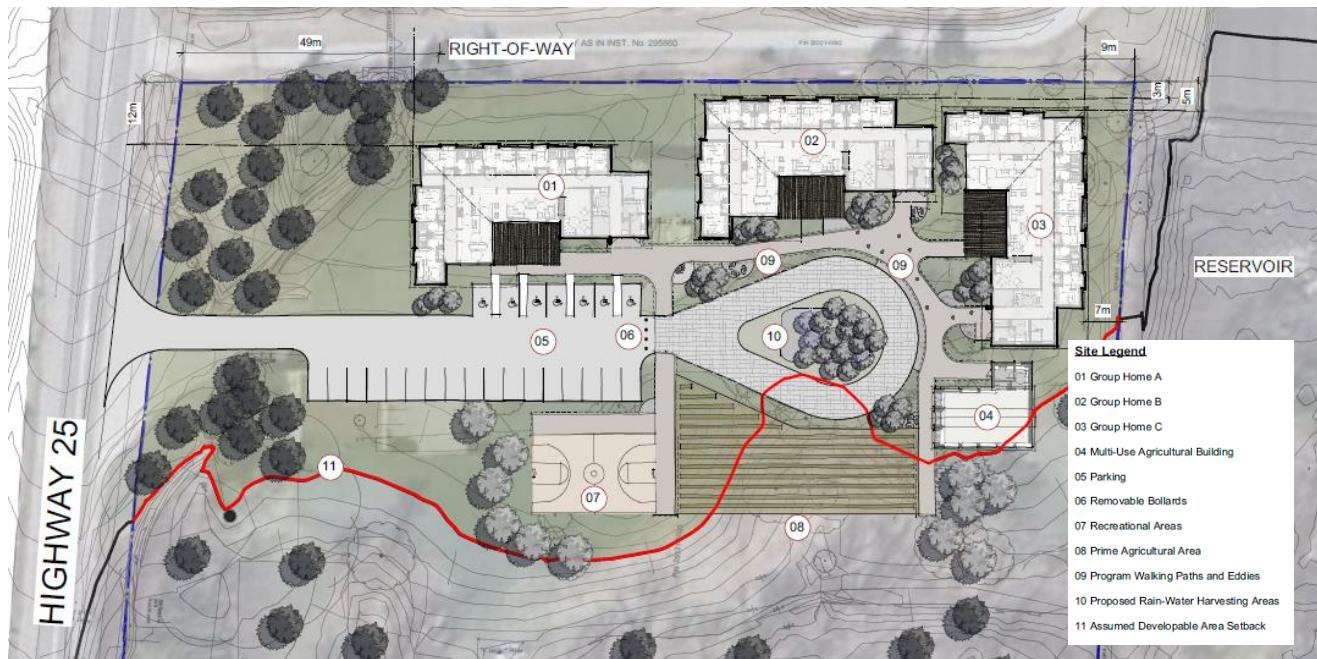


Figure 9: Detailed site plan

Key Project Statistics:

Metric	Quantity	Percentage
Dwellings	3	-
Rooms	18 (6 per dwelling)	-
Parking	24	-
Accessible Parking	6	-
Property Area	384,728 sq.ft. [8.8 acres]	100%
Hardscaped Area	39,717 sq.ft.	10%
Landscape/Prime Agricultural Area	317,297 sq.ft. (82.8%)	82.8%
Building Footprint	27,714 sq.ft.	7.2%

The proposal spans three group home dwellings with supportive staff spaces, one kitchen, and six bedrooms each. Additionally, a multi-use agricultural building is planned, which will include greenhouse space, workspaces for farming, and storage space.

The site includes several amenity and programming areas, including a sports court and a Prime Agricultural Area which includes seasonal gardening of crops for BRCCED's farm-to-table program.

The development is compatible with its natural surroundings by focusing development in the northern corner of the site, away from sensitive environmental areas and flood plains. This enables a transition, through agricultural and landscaped areas, into the naturalized area in the south of the site which residents can use for recreational walks.



Figure 10: Typical Floorplan

The interior floorplan has been designed to meet the specific needs of the communities BRCCED supports. BRCCED has decades of experience providing housing, and have an in-depth understanding of their design requirements from an operational, functional, and accessibility perspective.

BRCCED will be applying for funding for this project from CMHC's Affordable Housing Fund, which has specific accessibility requirements. These requirements are generally in alignment with national accessibility standards – specifically the CSA B651 and B652 standards, both of which are in excess of the Ontario Building Code. CSA B651 requires, for instance, a turning circle of 2100mm to accommodate the 95 percentile of wheeled mobility device users. That turning circle has been used in sizing the washrooms, bedrooms, and living rooms within the private resident spaces.

The needs of this particular user group have also been taken into account: the individuals who will be living and working in these group homes are culturally Deaf and communicate using American Sign Language. Accordingly, the building and site are designed using the DeafSpace Guidelines, and there are parts of those guidelines that speak to space needs as well. Communicating in sign language requires space and it requires visibility, and so that gets reflected in the arrangement of furnishings, the size and configuration of rooms and widths of corridors, the way the buildings will get placed on the site, and width and design of pathways on site, among other things.

PLANNING ANALYSIS

PLANNING HISTORY

SHS and BRCCED held two informal consultations with NEC staff over the course of 2024. These discussions established that this site has a complex history and that there may be various interpretations of how the NEP's policies apply to the proposed project. These communications culminated in an informal meeting on October 22nd, 2024 where the NEC presented its policy

interpretations based on discussions so far. The outcomes of that meeting formed the basis of Unity's preliminary site plan for the project.

A Pre-Application Consultation meeting was held with NEC staff on May 7th, 2025 to review Unity's site plan. Feedback from the PAC was useful in iterating the design and establishing a path forward to securing a Development Permit.

POLICY INTERPRETATION

NEC staff advised that a successful Development Permit application must demonstrate that the proposed development is cohesive with its rural surroundings, sensitive to environmental constraints, and an appropriate redevelopment of the existing use dwellings on-site.

The superseding applicable policy is the Niagara Escarpment Plan. Where the NEP does not comment on a policy, the local Municipal Zoning By-Laws, Official Plans, and the Provincial Planning Statement apply and form the basis for policy interpretation.

Existing Use Policies

Discussions with NEC staff have indicated that three group home dwellings may be permitted on the site based on existing use policies in the NEP. We have established the following:

- The Subject Lands have had 3 dwelling units in continuous use since before June 12, 1985, the day the Niagara Escarpment Plan was approved.
- Based on the definition of *existing use* in the NEP, these 3 dwelling units are considered an *existing use*. According to section 2.3.1 of the NEP, “an *existing use* may change to a similar use or a more compatible use only if it can be sufficiently demonstrated that the objectives of the application designation of this Plan are met”.
- According to the definition of a *single dwelling* in the NEP, a *group home* is considered a *single dwelling*.
- According to the definition of a *group home* in the NEP, each *group home* can accommodate three to ten persons, exclusive of staff. As such, each *group home* can accommodate up to 10 rooms. This Project can therefore accommodate up to 3 *group homes*, with a total of 30 rooms.
- Based on discussions with NEC staff, each of these rooms may have its own washroom (amounting to up to 30 washrooms), but only one kitchen is permitted per *group home* (amounting to up to 3 kitchens), per the interpretation of what constitutes a *single dwelling*.

BRCCED's proposed project adheres to section 2.3 *Existing Uses* of the NEP by changing an existing use to a more compatible use for an area designated Escarpment Protection Area in the NEP. The proposed project brings the use into closer conformity with the objectives of the NEP by removing an existing use that is not compatible with the policies of the NEP – a 6-unit apartment building that fronts onto Regional Road 25, is located within Conservation Halton's Headwater Floodplain Hazard, and does not represent the rural character of the area.

As noted above, each group home can have up to 10 rooms according to the definition in the NEP. BRCCED is electing to only include 6 rooms in each group home, for a total of 18 rooms. BRCCED believes this is more compatible with the overall policies of the NEP for a site designated Escarpment Protection Area, as it minimizes the expansion of the existing use and allows for more Prime Agricultural uses, as further discussed below.

Regarding expansion of an existing use, we have established the following:

- Each group home can be in a separate building, so long as expansion or enlargement of *existing uses* remains minor. Section 2.3.4 of the NEP further clarifies “An expansion or enlargement of a building, structure or facility associated with an existing use will be considered minor where the expansion or enlargement is no more than 25 per cent of the original development footprint, unless it can be demonstrated that a greater expansion or enlargement is compatible with the site and the surrounding landscape.”
- The new buildings do not have to be built in the same location as the existing buildings, as long as it can be demonstrated that they are being located in a more compatible location, as confirmed in conversations with NEC staff.

As noted in our description of the development proposal, an expansion of the existing use footprint is necessary to facilitate appropriate accessible design for future residents. Adhering to appropriate accessibility standards will also allow the project to access funding from CMHC’s Affordable Housing Fund, which is required to finance the project. The single-storey design of the project serves multiple functions: it prioritizes accessibility, it reduces costs, enabling BRCCED to provide deeply affordable housing, and it reduces the visual impact of the project, which protects scenic resources.

The expansion of the existing use represents 238.3% of the existing building footprint. While above the allowed “minor” expansion of 125%, this expansion is justifiable as the new buildings will be located in a much more appropriate area of the site than existing building, in the north which has minimal environmental constraints, is not within the flood plain, and is well-hidden from the road.

Rural and Agricultural Policies

Under section 1.4.1 of the NEP, the stated objectives of the Escarpment Protection Area include the enhancement of scenic resources and open landscape character, to protect and enhance the natural heritage of the escarpment, and to encourage agriculture and protect prime agricultural areas.

The proposed single-storey design will enhance the *scenic resources and open landscape character* of the site, as the buildings are well below the tree line of the mature canopy and will pose a lesser barrier to views of the escarpment. Further, the location of the buildings is beneficial to the streetscape, reverting it to a rural and naturalized state as opposed to the uncharacteristic apartment building along the Regional Road 25 frontage currently. Adding vegetation and landscaping to the site frontage will further enhance the relationship between the site and Regional Road 25.

According to section 1.4.1.6 of the NEP, one of the objectives of Escarpment Protection Areas is to encourage agriculture and protect agricultural lands and *prime agricultural areas*. Historically, 10097 Regional Road 25 was a mushroom farm, however, there have not been agricultural uses on

the site for decades. BRCCED's proposed project will return some agricultural uses to this site with a farming area and greenhouse.

Policy 2.8 of the NEP speaks to the encouragement of agricultural uses on Niagara Escarpment lands, especially in prime agricultural areas. By creating gardens, a small-scale crop farm, and greenhouses, the site creates agricultural uses where none exist currently. This serves to entrench agriculture as a use on the site and will protect prime agricultural lands into the future. The proposed project includes farm-to-table programming for residents. This program teaches residents planting, harvesting and cooking skills. The proposed project further encourages agriculture and protects agricultural lands in an Escarpment Protection Area.

The Provincial Planning Statement, 2024 (PPS) Section 4.3.2 lists permitted uses and activities in prime agricultural areas as agricultural uses, agricultural-related uses and on-farm diversified uses. As noted on page 21 of the Niagara Escarpment Plan, the NEP “is to be read in conjunction with the Provincial Policy Statement but shall take precedence over the policies of the Provincial Policy Statement to the extent of any conflict. Where the Niagara Escarpment Plan is silent on policies contained within the Provincial Policy Statement, the policies of the Provincial Policy Statement continue to apply, where relevant.” Though the PPS does not list dwellings as a permitted use in prime agricultural areas, the Niagara Escarpment Plan takes precedence over the policies of the PPS and allows *existing uses* as a use in Escarpment Protection Areas.

Other uses under Section 1.4.3 of the NEP are explicit if they apply only “outside of prime agricultural areas”. No such restriction is placed on *existing uses*, therefore it is our interpretation that the proposed development is allowed in a prime agricultural area, especially since it adds an agricultural use to a site that does not currently have one.

Natural Hazards Policies

BRCCED's objective is to bring the site in closer conformity with section 2.2.2 of the NEP, which outlines that the site shall not be prone to natural hazards, and the development will not impact the control of these natural hazards including flooding hazards, erosion hazards, or other water related hazards and hazard events associated with unstable soil or unstable bedrock.

The proposed development is located on a portion of the site that is most appropriate for development from a natural hazard perspective based on identified watercourses, driplines, wetlands, Conservation Halton Headwater Floodplain Hazard and appropriate buffers. As noted in the site section above, BRCCED has engaged a geotechnical consultant to conduct a Stable Top of Bank assessment. The results of this assessment will inform further iterations of the draft site plan, as will consultation and engagement with Conservation Halton.

One of the existing use buildings on the property – the sixplex located along Regional Road 25, is within Conservation Halton's Headwater Floodplain Hazard. By removing this building and proposing buildings in a more appropriate location on site, the proposed project brings the site into closer conformity with section 2.2.2 of the NEP.

Parking

No zoning-related performance standards related to parking supply apply to the site, and the Niagara Escarpment Plan does not explicitly address parking requirements. As such, the Halton Hills Zoning

By-Law may be used as a precedent for the expected parking demand of the site when it comes to development approval.

The By-Law requires between 1.0 and 2.3 parking spaces per dwelling unit (inclusive of visitor spaces), depending on the type of dwelling unit. However, the Halton Hills Zoning By-Law does not prescribe parking rates for group home uses. The proposed development consists of only three *single dwellings* as defined by the NEP (or three *dwelling units*, as defined by the Halton Hills Zoning By-Law). If we apply the maximum requirement of 2.3 parking spaces per dwelling unit, the proposed development would only require 7 parking spaces.

Although the proposed development contains only 3 single dwellings/dwelling units, it does contain 18 sleeping rooms and this must be taken into consideration when designing parking for the site. BRCCED has indicated that the staffing requirement on the site will be 3 staff per group home, per shift, meaning 9 staff total at any given time. This is in addition to other company vehicles and increased demand during staff changeover. Future residents of the proposed project will mostly not have the ability to drive, and therefore demand for parking spaces for residents is expected to be low or non-existent. Parking spaces will be for staff and visitors.

The development currently proposes 24 parking spaces, inclusive of 6 accessible spaces, in response to BRCCED's stated parking requirements.

STUDIES & REPORTS

Completed

Survey: A boundary and topographical survey with utility locates was completed by Stantec on October 22, 2024.

Archeological Assessment: Irvin Heritage Inc. completed a Stage 1 & 2 Archeological Assessment on December 10th, 2024, which assessed the entire site. Stage 1 found archeological potential on the site, and a further Stage 2 assessment used test pit surveys to further probe the site, but ultimately found no archeological resources. It was found that the site is free from archeological concern.

Phase I Environmental Site Assessment: G2S Consulting Inc. completed a Phase I ESA in December 2024. The ESA found oil storage tanks, pole-mounted transformers, fill material, and de-icing salt use on the site. A Phase II ESA is required to assess the potential for contamination related to the first three findings and will be completed alongside other required studies as the application moves forward.

Anticipated

Further to the above completed studies, we anticipate the following studies will be required and commissioned in support of this project:

- Arborist Report & Tree Protection Plan
- Environmental Site Assessment (Phase II)
- Geotechnical Study (including Slope Stability)
- Hydrogeological Study
- Functional Servicing Report (including well and septic)

- Traffic Impact Study

As this application is circulated to all Authorities Having Jurisdiction, we anticipate receiving a complete checklist of required site studies and reports required to receive a Development Permit.

SUMMARY

The proposed project will bring this site into closer conformity with the policies of the Niagara Escarpment Plan. Through waves of development, the current state of 10097 Regional Road 25 is a mismatched and underutilized collection of buildings in various states of disrepair. These buildings, as-is, do not conform to the Niagara Escarpment Plan's policies, they do not fit or contribute to the agricultural use of the prime agricultural area lands, they impinge on sensitive ecologies and watercourses, and they create a poor relationship between the rural road they front on and the site.

By redeveloping the site into a context-sensitive three-dwelling complex with an agricultural area and greenhouses, BRCCED seeks to both fulfil their mandate to deliver excellent services to their community and to enhance the site's functionality as part of the fabric of the Niagara Escarpment and rural Halton Region. The people who will call this site home will be active participants in BRCCED's farm-to-table program, being empowered to grow, process, and eat their own food grown in the fertile soils of the Escarpment area.

This project will help deliver vital housing and services for the Deaf community in Halton Region. Access to affordable and supportive housing is a critical need for individuals with disabilities across Ontario. These communities often face additional barriers to employment. Data from the 2022 Canadian Survey on Disability (CSD) indicates that 44% of Ontarians aged 25 and over with a disability had an after-tax median income of less than \$30,000, compared to 30% for individuals in the same age range without a disability. Data from the 2022 CSD demonstrated that people with disabilities had higher rates of being in core housing need, living in unaffordable housing, and living in homes in need of major repairs compared to individuals without a disability.

BRCCED's proposed project at 10097 Regional Road 25 can help meet this critical community need in Halton Region. At the same time, it can bring the site into closer conformity with the Niagara Escarpment Plan, by developing away from natural hazards and employing a rural design that protects scenic resources.

BRCCED is looking to create an exemplary facility and to set the standard, globally, for what Deaf living can look like in a rural context. We believe this design achieves that standard, while also satisfying the Niagara Escarpment Plan's policies. We look forward to working collaboratively with the Niagara Escarpment Commission, the Town of Halton Hills, Halton Region, and Conversation Halton to further refine our proposal through circulation.

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