



February 28, 2019

Mr. Charles O'Hara
Ontario Growth Secretariat
Ministry of Municipal Affairs
c/o Business Management Division, 17th floor
777 Bay Street
Toronto, ON
M5G 2E5

Dear Mr. O'Hara

**Re: PROPOSED AMENDMENT TO THE GROWTH PLAN FOR THE GREATER
GOLDEN HORSESHOE (2017) – ERO NUMBER 013-4504**

EXECUTIVE SUMMARY

- We have completed a review of the Proposed Amendment 1 to the Growth Plan for the Greater Golden Horseshoe and express our support for the changes proposed by the Provincial Government
- Specifically, on behalf of 8th Line Apple Orchard Inc. we fully support the Town of Milton's recommendation regarding refinement to proposed policy addressing Settlement Area Boundaries, the Provincial proposal regarding Natural Heritage Systems and Proposed Provincially Significant Employment Zone mapping in the immediate vicinity of the 8th Line Apple Orchard Inc. landholding
- We have reviewed the Town of Milton staff report PD-011-19, Making it Possible and strongly disagree with the description 'Future Employment' depicted on the 8th Line Apple Orchard Inc. lands
- For consistency with surrounding lands we request the Minister advise the Town to amend Appendix 'A' of the Town's staff report to label the 8th Line Apple Orchard Inc. lands and associated lands located on the west side of 8th Line as 'F- White Belt – Urban Boundary Expansion

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CB Land Management Inc. (CBLM) is currently retained by 8th Line Apple Orchard Inc., the owner of lands (the ‘Subject Lands’) in the Town of Milton, (the “Town”) Regional Municipality of Halton (the “Region”).

The subject lands are located immediately outside of the Town’s current urban boundary which was determined by Regional Official Plan Amendment (ROPA 38) and are approximately 34 hectares in size. The subject lands are bound by future residential lands to the north, the Britannia Road right-of-way (ROW) to the south, the Eighth Line ROW to the east and future residential lands to the west.

A significant feature of this area is the full urbanization of the Britannia Road ROW to six lanes fronting the subject lands and out to Highway 407 located just east of the subject lands. The full signalization of the intersections of Britannia Road and Eighth Line will be included with the urbanization works.

We have reviewed the Proposed Amendment 1 to the Growth Plan for the Greater Golden Horseshoe, 2017 and the Town’s response to the Proposed Amendment- Report PD-011-19 – MAKING IT POSSIBLE presented to Council on February 11, 2019 and are pleased to submit our comments to the Minister.

PROPOSED AMENDMENT 1

Insofar as Proposed Amendment 1 to the Growth Plan for the Greater Golden Horseshoe is concerned, on behalf of 8th Line Apple Orchard Inc. we would like to express our support for the changes the provincial government proposes as they relate to removing several significant policy challenges posed by the 2017 Growth Plan. It is our opinion that Proposed Amendment 1 will support the advancement of good planning in the Province of Ontario by providing a needed increase in housing supply and employment opportunities, and removing several of the many challenges posed by current policies of the Growth Plan.

Specifically, on behalf of 8th Line Apple Orchard Inc. CBLM would like to express our support for a few of the proposed changes to the Growth Plan, which are outlined below.

Settlement Area Boundaries

Proposed changes in section 2.2.8 provide flexibility to alter settlement boundaries outside of a Municipal Comprehensive Review (MCR) subject to certain criteria.

The proposed changes will provide greater flexibility for municipalities to address settlement area boundary issues, and will allow for settlement area boundary expansion that can respond to local conditions in a timely manner. It is recommended in report PD-011-19 that the size threshold of 40 hectares be expanded to allow for further flexibility in the implementation of these policies.

We fully support the Town's recommendation.

Natural Heritage Systems

Proposed changes in section 4.2.2 which clarify provincial mapping does not apply until implemented within municipal official plans, and that refinement of provincial mapping can occur at the time of initial implementation through the Official Plan.

The proposed changes will allow for appropriate refinement to the provincial NHS mapping through municipal official plans, and provides greater clarity in regards to the role of provincial mapping.

We fully support this policy change.

Proposed Provincially Significant Employment Zones (PSEZ)

In the immediate vicinity of the subject lands Provincially issued mapping for Zone 18 – 401-407 Meadowvale depicts the PSEZ to be in a north-south aligned corridor located between the Highway 407 corridor and the 8th Line ROW. In our opinion the 8th Line ROW is a logical limit for the PSEZ as future residential lands will be located on the west side of the 8th Line.

The future residential lands located on the west side of 8th Line are currently being processed for development through the Trafalgar Secondary Plan. The Secondary Plan has proceeded through its required Statutory Public Meeting and is scheduled to proceed



to approval at Town Council on March 25, 2019. Development of this Secondary Plan will proceed post 2021.

We fully support the PSEZ mapping issued by the Province in the vicinity of the subject lands.

TOWN OF MILTON, MAKING IT POSSIBLE – PD-011-19, FEBRUARY 11, 2019

Town of Milton Staff prepared a submission (staff report) to the Province in response to the Proposed Amendment 1 to the Growth Plan which was unanimously supported by Town of Milton Council on February 11, 2019.

The submission provided a summary of potential changes to Provincial planning policy and how these changes could be used to support the Town's strategic initiatives. Appendices "A" and "B" were appended to the staff report.

Recommendation 'E' in the staff report provided 'That the Minister proceed with Growth Plan Amendment 1 in relation to Milton's Future Employment Areas (as depicted in Appendix 'A') to support the designation of these lands for employment purposes in advance of the Region's Municipal Comprehensive Review (MCR)'.

In review of Appendix "A" – Positioning the Town for Growth and Economic Development Through Proposed Changes to Provincial Planning Policy we strongly disagree with the description 'Future Employment' depicted on the landholdings of 8th Line Apple Orchard Inc. for the following reasons.

- The submission does not include discussion/recommendations addressing this designation on the subject lands
- The subject lands have not been identified as a Provincially Significant Employment Zone therefore the mapping provided in Appendix 'A' contradicts mapping provided by the Province (Zone 18 – 401-407 Meadowvale) as well as Appendix 'B' of the same staff report
- For consistency with imminent approval of the Secondary Plan in the immediate vicinity of the subject lands (Trafalgar Secondary Plan) Appendix "A" should simply be amended to depict this area as 'F. White Belt – Urban Boundary Expansion' in concurrence with lands in the immediate vicinity

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We respectfully request the Minister consider this submission letter and advise the Town of Milton to amend the mapping provided in Appendix 'A' to reflect the comments provided above.

We thank the Ministry for the collaborative approach taken with this process and look forward to a positive response to this letter submission.

Yours Truly,

A handwritten signature in blue ink, appearing to read 'P. Brown', is written over a horizontal line.

CB Land Management Inc.

Paul Brown

Partner

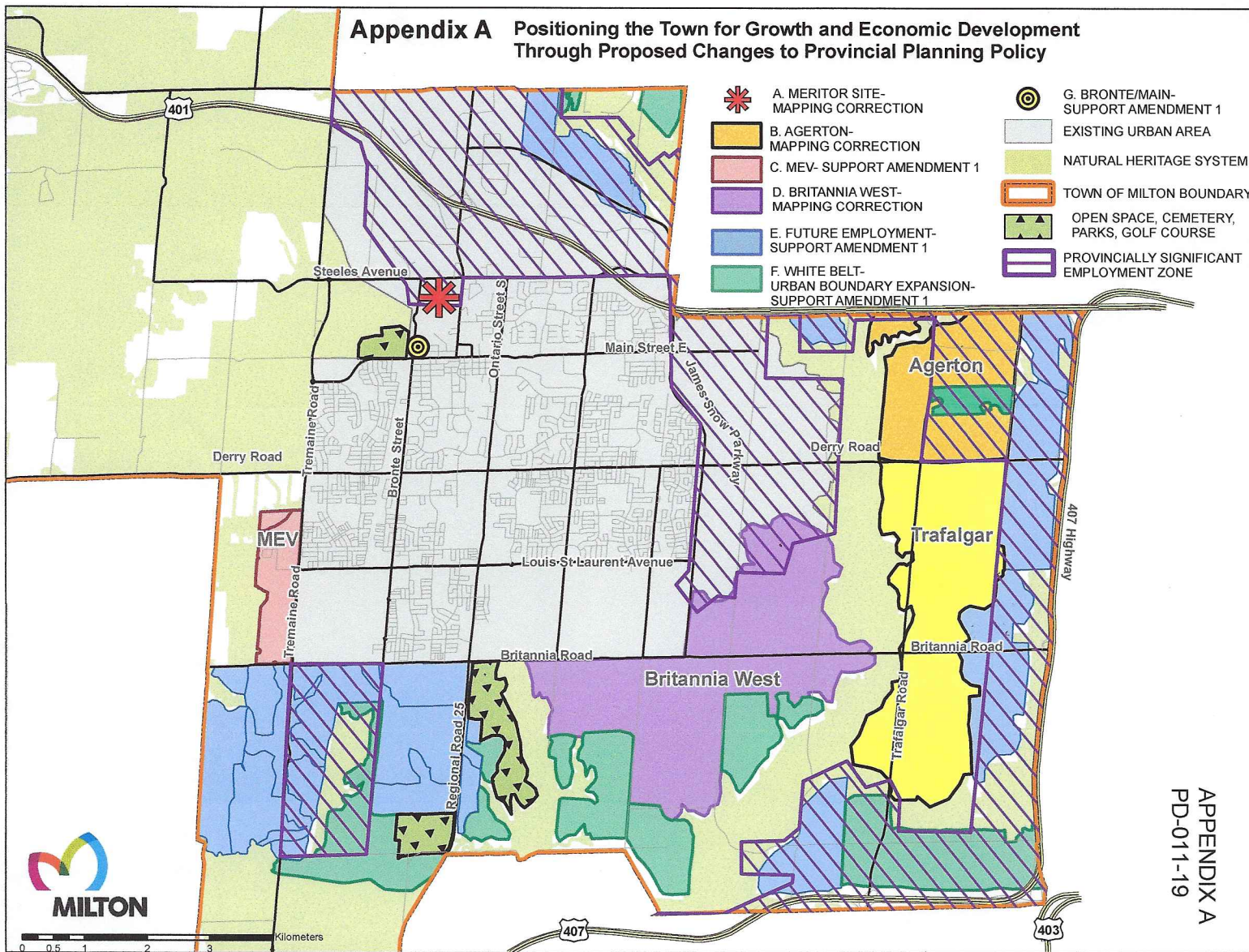
Cc: Mr. Bill Mann, CEO Town of Milton

Cc: Ms. Barbara Koopmans, Commissioner of Planning Town of Milton

Cc: Ms. Jill Hogan, Director of Planning Town of Milton

Cc: 8th Line Apple Orchard Inc.

Appendix A Positioning the Town for Growth and Economic Development Through Proposed Changes to Provincial Planning Policy



APPENDIX A
PD-011-19