



February 27, 2019

Mr. Charles O'Hara  
Ontario Growth Secretariat  
Ministry of Municipal Affairs  
c/o Business Management Division, 17<sup>th</sup> 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**

CB Land Management Inc. (CBLM) is currently retained by 811970 Ontario Ltd., the owner of 8240 Britannia Road (the "Subject Lands") in the Town of Milton, (the "Town") Regional Municipality of Halton (the "Region").

The subject lands are located outside of the Town's current urban boundary and are approximately 45 hectares in size. The subject lands are bound by Britannia Road to the north, rural property to the south, Bronte Road (Hwy #25) to the west and the main branch of Sixteen Mile Creek to the east. The subject lands are farmed for cash crop.

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 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 811970 Ontario Ltd. 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 much needed

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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 811970 Ontario Ltd. CBLM would like to express our support for a few of the proposed changes to the Growth Plan, which are outlined below.

1. Settlement Area Boundaries

Proposed changes in section 2.2.8 which 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.

2. Natural Heritage Systems (“NHS”)

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.

**TOWN OF MILTON, MAKING IT POSSIBLE – PD-011-19**

Town of Milton Staff prepared a submission to the Province in response to the Proposed Amendment 1 to the Growth Plan which was unanimously supported by the Town of Milton Council (attached).



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” are appended to the report.

We generally agree with the principals of the submission but strongly object to future land uses depicted on the landholdings of 811970 Ontario Ltd.

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 ‘Open Space, Cemetery, Parks, Golf Course’ depicted on the landholdings of 811970 Ontario Ltd. for the following reasons.

- The submission does not include discussion/recommendations addressing this designation.
- The 811970 Ontario Ltd. lands will be the subject of a future comprehensive Official Plan Review and land uses will be reviewed/considered and discussed with landowners at that time. It is premature at this time to depict detailed land uses on these lands
- Open Space, Cemetery, Parks, Golf Course is not a planning land use designation
- In our opinion, it would appear the Town is pre-determining land uses outside of an Official Plan Review/Land Base Analysis/ Secondary Plan and supporting studies
- For consistency, Appendix “A” should simply be amended to depict this area as ‘F. White Belt – Urban Boundary Expansion’ similar to lands in the immediate vicinity.

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 black ink, appearing to read 'Paul Brown', is written over a horizontal line.

**CB Land Management Inc.**

Paul Brown  
Partner

Cc: Mr. William Mann, Town of Milton, CAO













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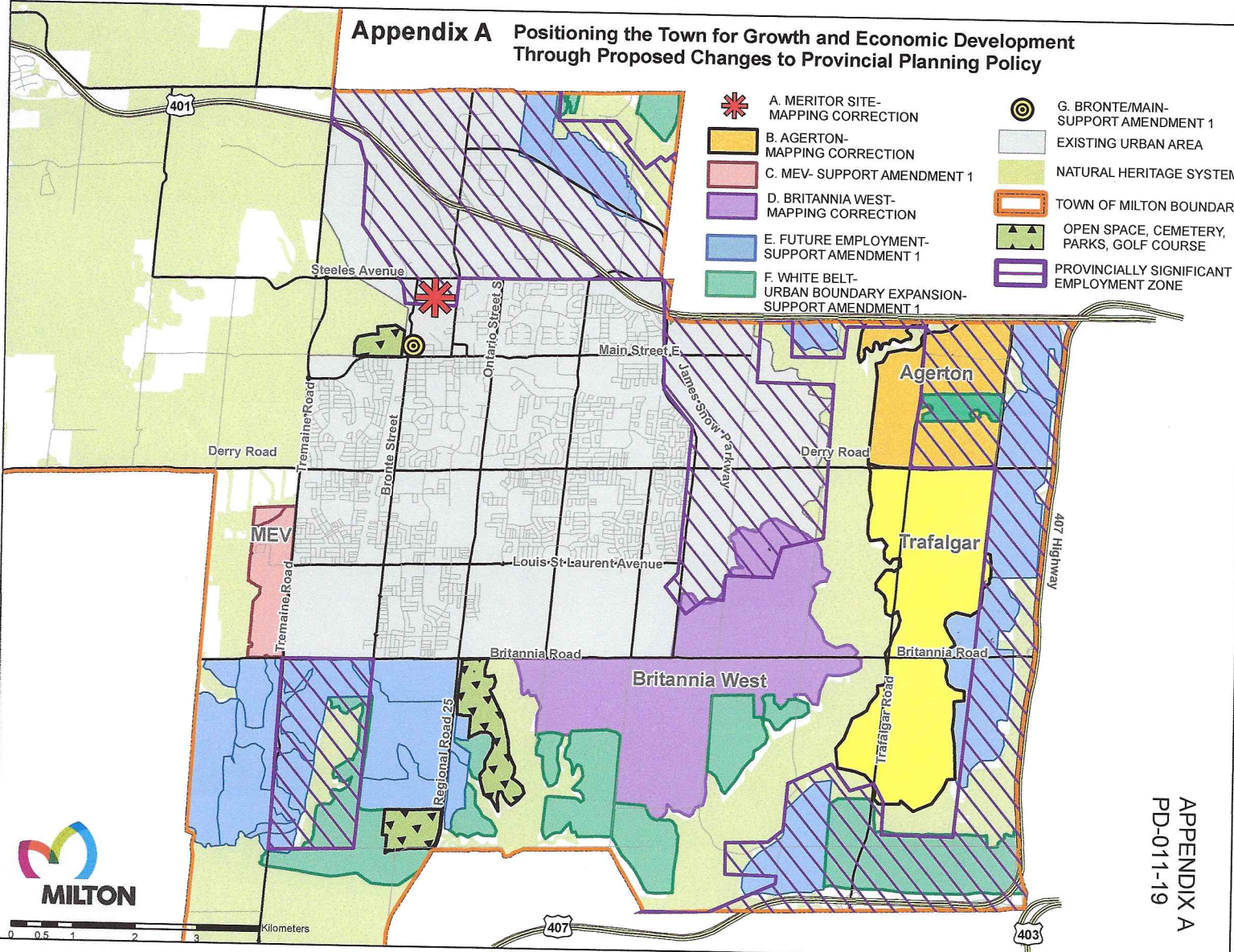


Cc: Ms. Barbara Koopmans, Town of Milton, Commissioner- Planning and Development  
Cc: Ms. Jill Hogan, Town of Milton, Director- Planning and Development  
Cc: Mr. Curt Benson, Chief Planning Official, Halton Region

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

-  A. MERITOR SITE-MAPPING CORRECTION
-  B. AGERTON-MAPPING CORRECTION
-  C. MEV- SUPPORT AMENDMENT 1
-  D. BRITANNIA WEST-MAPPING CORRECTION
-  E. FUTURE EMPLOYMENT-SUPPORT AMENDMENT 1
-  F. WHITE BELT-URBAN BOUNDARY EXPANSION-SUPPORT AMENDMENT 1
-  G. BRONTE/MAIN-SUPPORT AMENDMENT 1
-  EXISTING URBAN AREA
-  NATURAL HERITAGE SYSTEM
-  TOWN OF MILTON BOUNDARY
-  OPEN SPACE, CEMETERY, PARKS, GOLF COURSE
-  PROVINCIALLY SIGNIFICANT EMPLOYMENT ZONE



APPENDIX A  
PD-011-19