

February 28, 2019

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  
COMMENTS OF THE MILTON PHASE 4 WEST LANDOWNERS GROUP**

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MHBC Planning is currently retained by the Milton Phase 4 (MP4) West Landowners Group, with extensive land holdings in the Milton Phase 4 Urban Expansion Area, also known as the Britannia East/West Secondary Plan area in the Town of Milton (the "Subject Lands"). The Subject Lands are located within the Urban Area of the Town of Milton, and comprise approximately 900 hectares of developable land within the Town of Milton.

We have reviewed the Proposed Amendment 1 to the Growth Plan for the Greater Golden Horseshoe, 2017, on behalf of the MP4 West Landowners Group and would like to express our support for the changes the provincial government proposes as they relate to removing several significant challenges posed by the 2017 Growth Plan. It is our opinion and that of the MP4 West Landowners that Proposed Amendment 1 will support the advancement of good planning in the Province of Ontario by providing needed increased housing supply and employment opportunities, and removing some of the many challenges posed by the current policies of the Growth Plan.

Specifically, the MP4 West Landowners would like to express **support** for a number of the proposed changes to the Growth Plan, which are outlined below.

**1. Intensification and Designated Greenfield Area Density Targets**

- ✓ The proposed revisions in section 2.2.2.1 to the minimum intensification targets which will reduce the minimum intensification target applicable to Halton Region to 50 per cent to the 2041 planning horizon.
- ✓ The proposed revisions in section 2.2.7.2 to the minimum designated greenfield area density targets which will reduce the minimum designated greenfield area density target applicable to Halton Region to 50 persons and jobs per hectare.
- ✓ The proposed revisions in section 2.2.7.2 to allow councils of upper and single tier municipalities to request an alternative target where it can be demonstrated that the target cannot be achieved

and that the alternative target will support the diversification of the total range and mix of housing options and the achievement of a more compact built form.

The changes proposed will support the advancement of well-planned communities in the Province of Ontario by providing flexibility to respond to local conditions and market demand that the previous policy framework did not properly address.

## **2. Settlement Area Boundaries**

- ✓ The proposed revisions in section 2.2.8 which will enable flexibility to alter settlement area boundaries outside of an MCR subject to certain criteria, and up to a maximum of 40 hectares.

The changes proposed will allow 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 that the size threshold of 40 hectares be expanded to allow for further flexibility in the implementation of these policies.

## **3. Natural Heritage Systems**

- ✓ The proposed revisions in section 4.2.2 which clarify that the 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.

While the proposed Amendment indicates that the refinements which municipalities are permitted to make in their Official Plans must be consistent with policy 4.2.2 (1), which states that the Growth Plan mapping excludes lands within *settlement area* boundaries that were approved and in effect as of July 1, 2017, we recommend that Section 4.4.2 (5) be amended to clarify the intent of the policy.

We recommend that proposed policy 4.4.2 (5) should state:

*"Upper- and single-tier municipalities may refine provincial mapping of the Natural Heritage System for the Growth Plan for lands as defined in 4.4.2 (1) at the time of initial implementation in their official plans. For upper-tier municipalities, the initial implementation of provincial mapping may be done separately for each lower-tier municipality. After the Natural Heritage System for the Growth Plan has been implemented in official plans, further refinements may only occur through a municipal comprehensive review."*

The changes proposed 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 which was a point of confusion in the 2017 Growth Plan.

## **4. Employment Planning**

The proposed Provincially Significant Employment Zone mapping identified as part of the Proposed Amendment incorrectly identify a portion of the Britannia East/West Secondary Plan area as within the PSEZ. We request that this error be corrected, and that the PSEZ designation be removed from the northern portion of the Britannia East/West Secondary Plan area. The specific delineation of this area is also provided through the comments and submissions by the Town of Milton.

As noted, we understand the staff of the Town of Milton 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). We concur with the Town's comments and the MP4 West Landowners would like to express our support for the Town of Milton's comments in regard to the proposed amendment including the mapping corrections.

Yours truly,

**MHBC**

A handwritten signature in black ink, appearing to read 'Dana Anderson', written over the MHBC logo.

Dana Anderson, MA, FCIP, RPP  
Partner

Cc: Myron Pestaluky, Delta Urban  
MP4 Landowners Group  
Bill Mann, CAO, Town of Milton and Barb Koopmans, Director of Planning, Town of Milton