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Ministry of Municipal Affairs and Housing
777 Bay Street, 13th Floor
Toronto, ON M7A 2J3

October 7, 2022
File 10236

**Attn: Jennifer Le, Planner, Community Planning and Development (West), Municipal Services Office – Central Ontario
Ministry of Municipal Affairs and Housing**

Dear Ms. Le,

**Re: Environmental Registry of Ontario - Halton Region Official Plan Review, Modified Preferred Growth Concept
8846 Tenth Line
Halton Hills, ON**

Weston Consulting is the planning consultant for Anatolia Group., the owner of the properties municipally addressed as follows:

- 8846 Tenth Line, Halton Hills
- 9529 Fifth Line, Halton Hills

The purpose of this letter is to provide comments to the Ministry of Municipal Affairs and Housing (“MMAH”) through the Environmental Registry of Ontario (“ERO”) posting number 019-5684 requesting that 8846 Tenth Line (herein referred to as the “Subject Property”), be identified within ROPA 49 as “Future Strategic Employment Areas” to plan and protect them for serviced employment development *beyond the 2051 planning horizon*. It is acknowledged and anticipated that additional planning review and analyses will be necessary to delineate the limits of the “Future Strategic Employment Area” for the post 2051 planning horizon.

Description of Subject Property

The Subject Property is located north of Highway 401 adjacent to Fifth Line and Tenth Line and is currently utilized for agricultural purposes. Table 1 summarizes the approximate lot dimensions and sizes for the Subject Property:

Table 1 Lot Dimensions and Sizes

| Address | Lot Area (ha) | Lot Frontage (m) | Lot Depth (m) |
|-----------------|----------------------|-------------------------|----------------------|
| 8846 Tenth Line | 20.8 | 237 | 699 |

An air photo of the Subject Property is provided below:



Figure 1 – Air Photo of the 8446 Tenth Line, Halton Hills

Policy Context

The Subject Property is within the vicinity of the planned GTA West Corridor. 8446 Tenth Line is located within the Route Planning Study Area (Green Area) of the Preferred Route of the GTA West Corridor.

Map 1 – Regional Structure of the in-force Halton Region Official Plan (HROP) designates the Subject Property within the *Agricultural Area*. The Subject Property is adjacent to the *Future Strategic Employment Areas (Overlay)* per Map 1C – Future Strategic Employment Areas. The Subject Property is further designated within the *Prime Agricultural Area* per Map 1E – Agricultural System and Settlement Areas of the HROP, which predominately permits agricultural uses, and is located between the Georgetown and Milton Settlement Areas. Map 3 – Functional Plan of Major Transportation Facilities identifies the Subject Property within the *HPBATS / GTA West Corridor Protection Area* (under appeal).

The Subject Property is designated within the *Agricultural Area* per Schedule A1 – Land Use Plan of the Town of Halton Hills Official Plan (THHOP), which permits agricultural uses. Further to Schedule A1, 8846 Tenth Line is identified within the *HPBATS / GTA West Corridor Protection Area*.

Comprehensive Zoning By-Law 2010-0050 zones the Subject Property as *Agricultural*. New buildings for industrial uses are not permitted.

- For growth between 2041 and 2051 through a future amendment, where a clear framework is provided for when and how planned growth will be distributed based on principles of minimizing land consumption, making the most efficient use of land and infrastructure, and achieving other principles of the Growth Plan.

The Modified Preferred Growth Concept does not expand the urban boundary. Rather, it introduces a Future Strategic Employment Areas overlay in lieu of the New Employment Area designation provided through the Original Preferred Growth Concept.

The Subject Property is outside the urban boundary as agricultural land within the Original Preferred Growth Concept Plan and the Modified Preferred Growth Concept. ROPA 49 was adopted by Regional Council on the basis of the Modified Preferred Growth Concept at the June 15 meeting with a Notice of Decision circulated on June 22, 2022.



Figure 3 – Halton Region Official Plan Review, Original Preferred Growth Concept

Request - To Approve ROPA 49 With Modifications

We request that the MMAH plan for employment beyond 2051 and identify the Subject Property as Future Strategic Employment Area (“FSEA”) within ROPA 49. Specifically, we request the FSEA overlay provided on Map 1C (Attachment # 3 to ROPA 49) be modified to include employment lands for the post 2051 planning horizon and that the Subject Property be included in this modification. The FSEA overlay will serve to protect lands intended for future serviced employment uses from incompatible uses.



Figure 4 – Regional Official Plan Amendment 49, Map 1C – Future Strategic Employment Areas

Policy Analysis

Long-Term Protection of Future Strategic Employment Areas For Employment Uses

Policies 1.3.2.1 and 1.3.2.6 of the PPS 2020 speak to the planning, protection, and preservation of Employment Areas for current and future uses, especially for areas in proximity to Major Goods Facilities and Corridors, such as the planned GTA West Corridor, that will connect to the nearby Highways 401 and 407 interchange. The Subject Property is in close proximity to the planned GTA West Corridor.

Furthermore, Policy 1.3.2.7 of the PPS 2020 permits planning authorities to plan beyond a 25 year horizon for the long-term protection of employment areas provided that lands are not designated beyond said horizon. We request that this policy be invoked and municipal staff be directed to plan for employment lands post 2051.

On the basis of the noted policies, we believe that identifying the Subject Property as FSEA will ensure that lands located near Major Goods Facilities and Corridors (Highways 401/407 and the planned GTA West Corridor) are protected from incompatible uses for future, serviced employment uses beyond the 2051 planning horizon. We believe that it is appropriate for lands near the planned GTA West Corridor, specifically those between the Georgetown and Milton Settlement Areas and

in particular the Subject Property, to be protected for future land-extensive employment uses that are dependent on access to highway infrastructure.

In addition to ensuring land-use compatibility, the LNA has indicated that there is strong market demand for land-extensive employment uses and PPS Policy 1.3.2.1 speaks directly to the long-term protection of current and projected employment needs. Identifying the Subject Property as FSEA will ensure there is adequate supply to meet projected demand for such uses across both the Region and the Province as a whole.

Conclusions

Based on the foregoing, we request that the MMAH identify the Subject Property as FSEA within ROPA 49, to protect for employment land development beyond the 2051 planning horizon. The proposed FSEA expansion would ensure the protection of lands located near Major Goods Facilities and Corridors (Highways 401/407 and the planned GTA West Corridor) from incompatible uses for future, serviced employment uses that are land-extensive and dependent on highway access beyond the 2051 planning horizon. This modification to ROPA 49 is consistent with policy 1.3.2.7 of the PPS 2020 which allows municipalities to plan beyond the 25-year time frame.

We would like to clarify that our request is not to designate the Subject Property for employment uses within the 2051 planning horizon, but to simply identify it as FSEA for serviced employment development beyond 2051. It is recognized that additional planning review and analysis will be required to designate the Subject Property and to determine appropriate performance standards and use-permissions through detailed planning exercises such as OPAs / Secondary Plans. It is anticipated that this review would occur at a later stage through future Regional and Municipal OPR processes, and would occur in conjunction with a review of the existing urban boundary in relation to land needs.

We further request that the comments contained herein be kept on record within the Ministry's review process and request to be notified of any further studies, revisions, approvals and/or notices applicable to the Ministry's review process and reserve the right to provide further comments as more information becomes available. Should you have questions or require anything further, please do not hesitate to contact the undersigned (ext. 308).

Yours truly,

Weston Consulting

Per:



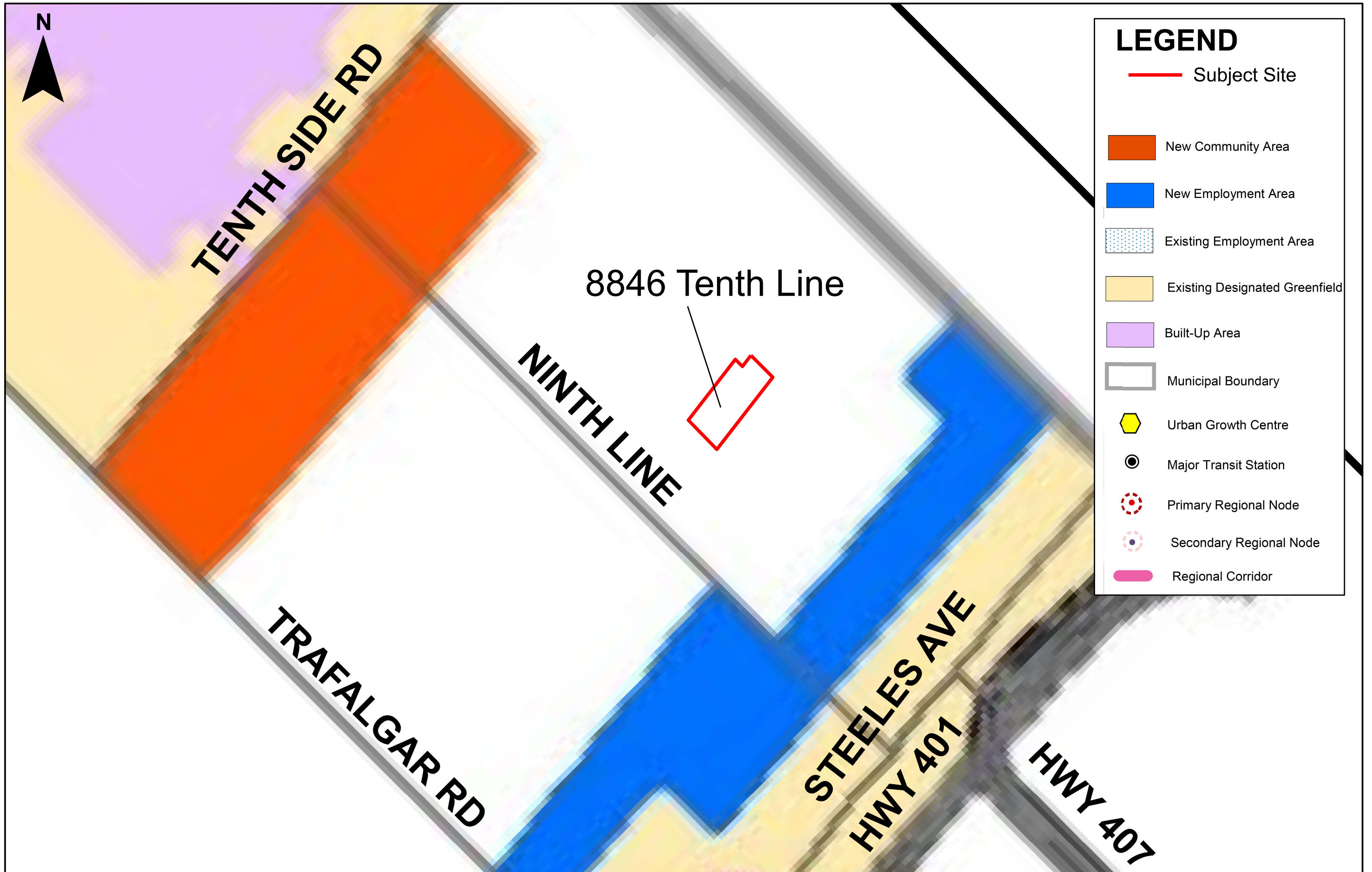
Alfiya Kakal, HBA, MPI, RPP
Senior Planner

c. Josh Berry, Anatolia Group

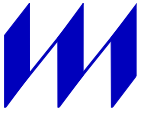
List of Attachments

- GTA West Corridor Preferred Route;
- Halton Region Municipal Comprehensive Review – Original Preferred Growth Concept dated February 2022; and,
- Halton Region Municipal Comprehensive Review – Modified Preferred Growth Concept dated June 2022.
- Provincial Policy Statement 2020 Policy Extracts









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PPS 2020 Policy Extracts:

1.3.2 Employment Areas

1.3.2.1 Planning authorities shall plan for, protect and preserve employment areas for current and future uses and ensure that the necessary infrastructure is provided to support current and projected needs.

1.3.2.6 Planning authorities shall protect employment areas in proximity to major goods movement facilities and corridors for employment uses that require those locations.

1.3.2.7 Planning authorities may plan beyond 25 years for the long-term protection of employment areas provided lands are not designated beyond the planning horizon identified in policy 1.1.2.