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October 7, 2022

Matter No. 173720

BY EMAIL: ropr@halton.ca

Jennifer Le
Municipal Services Office - Central Ontario
16th floor, 777 Bay Street
Toronto, ON M7A 2J3

Dear Ms. Le:

**Re: Proposed Regional Official Plan Amendment 49 (ROPA 49)
Argo Valley View Limited Lands – Fourth Line and Lower Base Line West, Milton**

We are the solicitors for Argo Valley View Limited, the owner of lands located at the northwest corner of Fourth Line and Lower Base Line West in the Town of Milton.

Please accept this letter as our client's comments to the Minister of Municipal Affairs and Housing (the "Minister" or the "Ministry") respecting the Minister's review of Regional Official Plan Amendment No. 49 ("ROPA 49") for the Region of Halton.

As the Minister is likely aware, during the municipal processing of ROPA 49 for consideration by Halton Regional Council, a Preferred Growth Concept ("PGC") was created. The PGC proposed an urban boundary expansion of 1,120 ha, consisting primarily of new community land in Milton and Halton Hills, for residential, commercial and institutional uses. This expansion was deemed by advisors as needed to provide a market-based supply of ground-related housing as directed by the Province. Within the PGC, the Argo Valley View land were shown as being part of a "New Community Area". These expansion areas were to accommodate a population growth of 62,000 across the Region.

Notwithstanding the foregoing, the version of ROPA 49 adopted by Halton Regional Council does not incorporate the New Community Areas and instead proposes to maintain a static urban boundary to 2041. As well, the adopted version of ROPA 49 does not plan for the Region's expansion to accommodate a planning horizon to 2051 as is required by *A Place to Grow: Growth Plan for the Greater Golden Horseshoe, 2020*.

As part of the Minister's current approval exercise, we ask that the Minister consider the following points in relation to ROPA 49, Halton's proposed urban boundary and Argo Valley View's lands. Please note: These same comments were provided in full to Halton Regional Council prior to its adoption of ROPA 49; however, these comments were not acknowledged or acted upon:

- All upper- and single-tier municipalities that are subject to *A Place to Grow: The Growth Plan for the Greater Golden Horseshoe, 2020* must plan to accommodate population and employment growth to 2051. For Halton Region, staff and advisors have previously noted that this means planning for 1,100,000 people and 500,000 jobs by 2051.

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- Argo Valley View's lands present an opportunity to accommodate part of the aforementioned future growth. Our client's lands are located a mere 300 m south from the planned Milton Phase IV (Britannia Secondary Plan) expansion. The infrastructure required for the Milton Phase IV lands would easily service the Argo Valley View Limited lands. This makes the Argo Valley View Limited lands a logical expansion for Milton Phase IV that ought to form part of any first phase Urban Area expansions to accommodate growth within 2031-2041.
- Argo Valley View Limited's lands are well positioned to be serviced through the Town of Milton and Region of Halton planned water, wastewater and road infrastructure required to service planned growth. Halton Region's 2012 Master Servicing Plan, and subsequent 2017 & 2022 Development Charges Water and Wastewater Technical updates, illustrate that Regional wastewater projects are to be constructed along Fourth Line and Lower Base Line. These services would extend across the frontage of the Argo Valley View Limited lands, meaning that planned municipal urban services will be at our client's doorstep.
- Amendments contained within ROPA 49 to subsection 77(8) of the Halton Official Plan note that expansions of the Urban Area will be deemed appropriate based on existing or planned infrastructure, public service facilities and areas where servicing can be provided in a financially and environmentally sustainable manner. The planned water and wastewater infrastructure noted above will accommodate the servicing required for the Argo Valley View Limited lands without the need for upgrades. This demonstrates that our client's lands are ideal for urban development within the 2031-2041 planning period.

We respectfully request that the Minister make the modifications to ROPA 49 necessary to increase the size of Halton's urban boundary to appropriately accommodate growth to 2051. In doing so, we further submit that the Argo Valley View Limited lands are a prime candidate for inclusion within this expanded boundary, with a development timeline within 2031-2041, for the reasons outlined in this letter.

We ask that you please provide us with notice of all decisions of the Ministry concerning proposed ROPA 49. Should you require any further information, please do not hesitate to contact the undersigned at pharrington@airdberlis.com.

Yours truly,

AIRD & BERLIS LLP



Patrick J. Harrington
PJH/NH

c. Argo Valley View Limited

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