

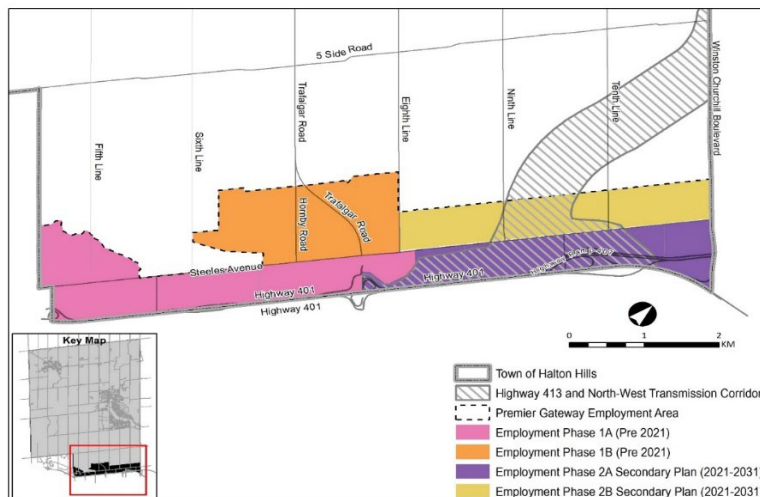
Thank you for the opportunity to provide comments on the proposed *Bill 97, Helping Homebuyers, Protecting Tenants Act, 2023*. The Town of Halton Hills' comments are attached and summarized below.

Areas of Employment Definition:

Bill 97 proposes to remove institutional and commercial uses from the definition of Areas of Employment which will prohibit uses such as commercial and office uses not associated with primary industrial uses in Employment Areas. Prohibiting institutional and commercial uses in strategically located Areas of Employment, is not in keeping with the proposed PPS goal of supporting a modern economy and promoting economic development and competitiveness. In addition, it will require that Employment Areas in the Town, such as the Premier Gateway Employment Area, which are already designated and, in some cases, zoned to allow supportive commercial and institutional uses be stripped of those existing land use permissions. As such, the Town does not support the revised definition of Areas of Employment.

The Premier Gateway Employment Area is identified as the Town's Prestige Employment Area where large scale employment growth is to be directed. The Premier Gateway is strategically located near Hwy 401, Hwy 407, and the proposed Hwy 413. The Area is divided into four phases; Secondary Plans have been completed for three phases (Phase 1A, Phase 2A, Phase 1B) while a secondary plan is near completion for the last phase of employment lands (Phase 2B). Existing and proposed land use permissions allow for institutional and commercial uses including business and professional offices in free-standing buildings or as part of an industrial mall, hotels, banquet halls, full-service restaurants, convenience stores, commercial fitness centres and limited retail and service commercial uses. These uses are permitted in areas designated, and in the case of Phase 1A and 2A zoned, as "Gateway Area" or "Business Commercial Area" and are located along strategic roads or at key intersections, such as at Trafalgar Road and Steeles Avenue, and Winston Churchill Boulevard and Steeles Avenue.

Figure 1: Premier Gateway Employment Area



As part of these Secondary Plan processes, the Town has completed supportive commercial needs assessments to address the market demand for Supportive Commercial Uses in each Employment Area. The range of Supportive Commercial Uses often include business supportive retail and professional office space which contribute to creating comprehensive and complete Employment Areas and influence the vitality and connectivity of the local economy. Demand for these uses is influenced by various sources, including need generated from businesses and employees within the area, as well as traffic generated from existing uses in the vicinity of the Employment Area.

The Premier Gateway Employment Area has been planned to support local job growth and attract innovative investment and a talented workforce. Restricting institutional uses will prevent skilled trades and apprenticeship programs and other technology institutions from locating close to key advanced manufacturing, agri-business, clean technology, and food and beverage processing sectors. In addition, supportive commercial uses provide services and convenience retail uses that primarily serve businesses and employees within the Employment Area and the travelling public. Allowing these supportive uses will minimize vehicle use and contribute to the long-term success of the Employment Area.

The Province recently approved ROPA 49 which expanded the urban boundary in Halton Hills to accommodate approximately 873 ha of employment lands (see Appendix A). It is essential that those lands allocated to accommodate employment to the year 2051 develop to support large industrial and manufacturing uses but also other employment uses that generate high levels of employment, including institutional, office and commercial uses to support a strong economic base for the Town and its residents.

It is crucial for the Town of Halton Hills that supportive institutional and commercial uses continue to be permitted within Areas of Employment; providing this flexibility is imperative for developing vibrant, stable, and innovative Areas of Employment better positioned to respond to the changing needs of the job market. To this end, the Town strongly recommends that the Province should revise the proposed definition of Areas of Employment to provide for such uses as set out in this letter.

Fee Refund:

Town staff are in support of exempting certain municipalities and complex projects from the fee refund provision. Consideration should be given to exempting municipalities which have a consistent record of completing application reviews in a timely manner and working with proponents to identify solutions in support of appropriate development. Consideration should also be given to exempting those municipalities located outside of the 29 fastest growing as cost to the municipalities to secure the resources to complete reviews within the legislated timeframes becomes more difficult, especially for large complex projects.

Site Plan Control for Residential Development of 10 or Fewer Units:

As part of Bill 23, the More Homes Built Faster Act, 2022, the Planning Act was amended to exclude residential developments of 10 or fewer units on a single lot from Site Plan Control. Through ERO# 019-6822 regulations are being proposed to allow Site Plan Control to be used for residential developments of 10 units or fewer specifically for parcels of land: any part of which is located within 120 metres of a shoreline; and any part of which is located within 300 metres of a railway line. Staff agree that Site Plan approval for developments under these conditions is important; however, staff believe that the regulations should be extended more broadly to apply to all parcels proposed for multi-unit residential developments, regardless of geography, to ensure that health, safety and accessibility considerations are addressed, at a minimum. Matters related to safe vehicle access to a public road allowance, on-site traffic and pedestrian circulation, garbage storage and loading, compliance with Accessibility for Ontarians with Disabilities Act, stormwater management impacts and mitigation, grading impacts to adjacent private land, mitigation or accommodation for noise impacts from roadways or private commercial/industrial uses, municipal wellhead protection, minimum lighting requirement and snow storage continue to pose health, safety, liability and property standard concerns regardless of the size or scale of the development. Staff remain concerned that there will be significant challenges in addressing these matters outside of the Site Plan Control process.

ICBL Appeal Process:

Staff do not support the proposed amendment to allow an individual to appeal an ICBL at the time of initial passing rather than only at the time of extension. This creates an unnecessary burden on the OLT. ICBLs are used in circumstances where Planning Authorities have determined a pause is necessary to ensure a planning process is being carried out in the public interest, with no application or actions otherwise that would compromise this. Allowing individuals to appeal undermines the process and opens a window whereby action could be taken (i.e., development) that is counter to the public interest. For instance, the Town passed an ICBL for cannabis cultivation to prevent cannabis operations from proceeding ahead of the municipality establishing policies for regulating the use.

Land Development Facilitators:

The Town requests that additional clarity and guidance be provided on the role of facilitators and their ability to make agreements with landowners or municipalities with respect to lands use.