



August 4, 2023

Ministry of Municipal Affairs and Housing
777 Bay Street, 17th floor
Toronto, Ontario M7A 2J3

**RE: PROPOSED PROVINCIAL POLICY STATEMENT, 2023 -
5122 FIRST LINE, MILTON, ON**

The enclosed letter outlines the proposed policy changes of the new provincial planning policy instrument with respect to the lands municipally known as 5122 First Line, Milton ON (PIN: 249340056) (the 'Subject Lands'). **Figure 1: Location Map** outlines the location of the Subject Lands. Tribal Partners is currently undergoing a due diligence process for the Subject Lands.

A formal letter was submitted to the Region of Halton on May 9, 2023 by Tribal which outlined a request that the Subject Lands be included within the Urban Boundary Expansion for 2031, rather than 'Future Strategic Employment Area' in 2041-2051 through the Regional Plan Review process. The purpose of Regional Official Plan Amendment 45 (ROPA 45) was to provide an update to the land use framework to guide growth within the Region to 2051. Policies and Schedule updates were made to address housing and growth management; and long-term planning for employment and infrastructure.

On June 15, 2022, Halton Regional Council adopted ROPA 49, and on November 4, 2022, the Minister of Municipal Affairs and Housing approved the Regional Official Plan Amendment with modifications. Map 1C 'Future Strategic Employment Areas' (**Figure 3**) of the Regional Official Plan, approved through ROPA 49, includes a 'Future Strategic Employment Areas' overlay on the Subject Lands. Policy 139.6 of the Regional Official Plan identifies the purpose of the overlay:

"The purpose of the Future Strategic Employment Areas, shown as an overlay on Map 1C identify and protect from incompatible uses certain lands that are strategically located with respect to major transportation facilities and existing Employment Areas and are best suited for employment beyond the planning horizon of this Plan."

The Town of Milton is currently updating its Official Plan, which is anticipated to be in conformance with the policies of ROPA 49, including the Future Strategic Employment Areas' overlay.

The Ministry of Municipal Affairs and Housing is consulting on the proposed policies for a new land use planning policy document which combines the current 'Provincial Policy Statement' and 'A Place to Grow: Growth plan for the Greater Golden Horseshoe.' The purpose of this letter is to review the emerging policies in light of the current planning permissions for the Subject Lands.

CONTEXT:

The Subject Lands are located adjacent to the CN Milton Logistics Hub (Logistics Hub). The federal government approved the Logistics Hub on January 21, 2021, through an extensive Environmental Assessment process. The first phase of construction for the Logistics Hub began in late Fall 2021 which included site preparation activities. Phase 2 is anticipated to commence this Fall 2023, and includes terminal construction, the main truck entrance, parking areas, and rail track to support the operation of the facility.

Given construction of the CN Milton Logistics Hub is well underway, we believe the Subject Lands should be designated Employment and not be subject to the *Future Strategic Employment Area* overlay. Employment lands are necessary adjacent to this significant transportation hub to ensure efficient goods movement with freight-supportive development. The province has already recognized the importance of the facility with a Provincially Significant Employment Zone (**Figure 2**) that includes the Subject Lands and the majority of the Logistics Hub.

REVIEW OF RELEVANT EMERGING POLICY:

The proposed Provincial Policy Statement, 2023 (dated April 6, 2023 and updated June 16, 2023) provides a number of policies for land use planning in Ontario. The following Employment policies are particularly relevant to the Subject Lands:

Proposed Policy 2.8.2.1(b):

*“Planning authorities shall plan for, protect and preserve **employment areas that are located in proximity to major goods movement facilities** and corridors, including facilities and corridors identified in provincial transportation plans, for the employment area uses that require those locations.”*

Proposed Policy 2.8.2.2 (a):

*“Planning authorities shall designate, protect and plan for all employment areas in settlement areas by: planning for employment area uses over the long-term that require those locations including manufacturing, research and development in connection with manufacturing, **warehousing and goods movement**, and associated retail and office uses and ancillary facilities.”*

The Subject Lands are well situated to support the CN Logistics Hub that is currently under construction. While we can appreciate that the Region has protected the lands for future employment uses; it is now the time to actively plan for this wider employment area and bring these lands within the urban boundary.

It is our opinion that holding the lands for agricultural uses is short-sighted, when the statistical data (including the recent census data) shows there is a need and desire for Employment lands within the province and Region, especially those located in proximity to current and future transportation networks. Today’s available industrial supply has dropped to record lows with industrial vacancy rates in the GTA less being than 2%. In addition, lands available for large scale logistics, e-commerce and warehousing in close proximity to major transportation infrastructure such as intermodal yards are almost non-existent.

SUMMARY:

While we cannot speak for other landowners directly, we believe that the Subject Lands and other lands surrounding the Logistics Hub should be designated for Employment Uses immediately. The Region, through its Official Plan Review, has determined that the Subject Lands be designated Employment at a later date (2041+), however, in our opinion, they should be designated for Employment Uses now. Designation of the lands now allows for the requisite studies to begin including preparing a Secondary Plan for the area. Furthermore, the province has already designated these lands as a “Provincial Significant Employment Zone” as the lands are located next to major future CN intermodal railway hub that is already started construction.

It is our understanding that provincially significant employment zones have been removed in the proposed Provincial Policy Statement, 2023; however, the orderly planning of employment lands near transportation hubs (as identified in the emerging policy) has remained a priority. In our opinion, the Region of Peel has not had regard for our request and has not met the policies of the proposed Provincial Policy Statement, 2023.

We appreciate your consideration and are available to discuss further.

Sincerely,



Lance Trumble
Managing Director and Founding Partner