



Town of Milton  
150 Mary St.  
Milton, ON L9T 6Z5  
905-878-7252  
www.milton.ca

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

**By E-mail**

**ERO number: 019-5684**

### **Regional Municipality of Halton's Regional Official Plan Amendment 49**

I refer to the above referenced proposal for approval by the Minister of an amendment to an official plan under section 21 of the *Planning Act*, with respect to the Regional Municipality of Halton's Regional Official Plan Amendment 49 (ROPA 49).

The Town of Milton has consistently supported a responsible, sustainable and balanced plan for growth in the long-term to the 2051 planning horizon, in conformity with Provincial policy and guidance.

Milton Council's concerns with respect to ROPA 49 were summarized in Mayor Krantz' letter to Minister Clark dated July 27, 2022 (Tab 1 attached).

In the opinion of Milton Staff ROPA 49 is fundamentally flawed for the following reasons:

- The Growth Plan for the GGH provides that the applicable time horizon for land use planning is 2051, including settlement boundary expansions and the land designated as employment areas. ROPA 49 fails plan to plan for the quantity of land required to accommodate forecasted growth to the 2051 time horizon; and it fails to ensure the availability of sufficient land, in appropriate locations, for a variety of employment to accommodate forecasted employment growth to the 2051 time horizon.
- The forecasted population and employment growth cannot be reasonably accommodated within the existing settlement area boundary. An urban boundary expansion will ensure Milton's ability to strategically manage population and employment growth and accommodate sufficient housing supply that reflects market demand and what is needed in the local community.

ROPA 49 also contradicts the professional recommendations of Halton Region Staff as presented to Regional Council in February 2022. This "Preferred Growth Concept" (PGC) recommended by Halton Region Staff was diligently prepared and was supported by extensive consultation and in-depth research. At its meeting of January 17, 2022, Milton Council resolved to endorse the Halton Region Staff recommended PGC, which recommended modest urban boundary expansions for Milton and Halton Hills to accommodate future population and employment growth to 2051 (Staff Report DS-006-22 attached as Tab 2) . All of Halton's municipalities supported the PGC, in principle,

based on Staff recommendations. Notably, both Milton and Halton Hills Council's supported the urban boundary expansions proposed in their respective local municipalities.

While Milton Council remains supportive of the PGC originally recommended by Halton Region Staff in February 2022, there are two modifications to the original PGC that Milton Staff would ask the Minister's office to consider. Namely, the phasing of Milton's growth through 2022 to 2051 and the designation of the western portion of the CP lands at Trafalgar Road.

Milton Council requests that population and employment growth is phased to deliver a concurrent and steady stream of development land in Milton. This is necessary to ensure shovel-ready employment land and an appropriate balance between residential intensification and new community areas to the 2051 time horizon taking into account the following considerations:

- Concurrent delivery of existing designated greenfield areas (Agerton/Trafalgar/Britannia/MEV) to pre-2031 to ensure Milton has land for innovation/knowledge based job creation in complete community areas.
- Milton's new designated greenfield areas must be phased to ensure a continuous supply of market based housing beyond 2031.
- Milton needs a steady flow of investment ready employment lands. Planning work for delivery on new employment lands to accommodate warehouse/logistics will need to commence prior to 2031.
- Milton's main planned employment area (Derry Green Business Park) will be built out by 2031. Milton can't afford to have a 10 year gap of shovel ready employment lands. This would not be practical or fiscally responsible for the Town and Region.

Milton's preferred phasing is provided in Tab 3 attached. Milton request that the Tables in the Regional Official Plan be updated to reflect this preferred phasing.

On April 20, 2022, Halton Region Council supported a Notice of Motion (Hamid, Burton) that directed Region Staff to add the western portion (approximately 25 hectares) of the CP Railway lands at Trafalgar Road to the Regional Urban Boundary through ROPA 49. This rounding off of the Major Transit Station Area (MTSA) is required to support the proposed GO Rail Transit Station in the Agerton area, enabling comprehensively planned high-density population and employment growth supportive of transit and existing infrastructure.

Having regard to the above, Town of Milton Staff remain supportive of the original Preferred Growth Concept as recommended by Halton Region Staff in February 2022, but modified to include the western portion of the CP lands at Trafalgar Road as new community area/MTSA and with the phasing of lands pre-2041 and post-2041 adjusted to bring forward the timely delivery of new designated greenfield and employment areas.

If the Minister is minded to add all of Milton's white belt lands into the urban boundary, Town Staff would request that consideration be given to the Milton Council endorsed "Halton Balanced" Growth Concept set out in Staff Report DS-055-21 (Tab 4 attached). This report presented the "Halton Balanced" Growth Concept as input into Halton

Region's Official Plan Review. It was supported by a Land Needs Assessment (LNA) undertaken by Malone Given Parsons that conforms to the Provincial Growth Plan and would ensure a balanced ratio of residents to jobs in Milton. Town Staff would note that the distribution of community areas and employment areas within the whitebelt lands (Appendix B to Staff Report DS-055-22) is conceptual only and may require some adjustment or refinement. Town Staff would be pleased to engage with the Minister's office to discuss any modifications that may be necessary or desirable.

In summary, Town of Milton Staff do not support the modified growth concept with no urban expansion (ROPA 49). The Town of Milton support the original Preferred Growth Concept (PGC) as recommended by Halton Region Staff in February 2022, subject to the addition of the community area/MTSA on the western portion of the CP lands at Trafalgar Road and adjustments to the pre-2041 and post-2041 growth phasing. If the Minister is minded to include the whole of Milton's white belt lands in the urban boundary, Town Staff will be pleased to discuss any modifications to the Town of Milton's "Halton Balanced" growth concept that may be considered necessary or desirable in the interests of good planning.

Thank you for your consideration of Milton's position. If you have any questions or require additional information, please do not hesitate to contact me.

Sincerely,

Jill Hogan, Commissioner, Development Services